



Cyient DLM Limited

Policy for Preservation and Archival of Documents

Cyient DLM Limited

Mysore Office:
Plot no.347, D1 &2, KIADB
Electronics City, Hebbal Industrial
Area, Mysore 570 016,
Karnataka, India

Regd Off:
3rd Floor Plot No.11
Software units Layout,
Infocity, Madhapur, Hyderabad,
Telangana 500 081, India

www.cyientdlm.com
CIN: U31909TG1993PLC141346
T: +91 8214282222/4004500
F: +91 8214000369



Policy Information:

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CS/DLM/ARCH/V0	Company Secretary	Board of Directors	27 December 2022

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1. Introduction

In terms of Regulation 9 of the LODR 2015, the Board of Cyient DLM has adopted this Policy, as required under applicable regulations.

This Policy is effective from 27 December 2022

2. Objective

The purpose of this Policy is to determine the preservation period for Records/Documents based on their reference value and legal requirements. The Policy also facilitates adequate protection, preservation and destruction of Records and determines the period for which the information which has been disclosed by the Company to stock exchange(s) is to be hosted on the website and the period for which it will be archived thereafter. The following aspects are considered while arriving at the preservation period:

- i. Company's own information retrieval needs;
- ii. Statutory requirements under respective statutes;
- iii. Litigation requirements;
- iv. To ensure easy retrieval;
- v. To ensure that unwanted records do not occupy storage space;
- vi. Electronic storage and retrieval.

3. Applicability

This Policy is applicable to the Company, the Board, KMP, Senior Management and all Employees.

4. Definitions

- 4.1 **“Board”** means the Board of Directors of the Company.
- 4.2 **“CA 2013”** or **“Act”** means the Companies Act, 2013 and rules made thereunder, as amended from time to time.
- 4.3 **“Company”** or **“Cyient DLM”** means Cyient DLM Limited.
- 4.4 **“Document”** includes requisition, order, declaration, forms, summons, notice and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.
- 4.5 **“Key Managerial Personnel”** or **“KMP”** shall have the same meaning ascribed to it under the Act.
- 4.6 **“Board”** or **“Board of Directors”** shall mean the Board of Directors of Cyient DLM Limited as may be reconstituted from time to time.
- 4.7 **“Financial Year”** shall have the same meaning ascribed to it under the Act.

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- 4.8 “**Electronic Form**” with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, microfilm, computer generated micro fiche or similar device.
- 4.9 “**LODR 2015**” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- 4.10 “**Policy**” means this Policy for Preservation and Archival of Documents as amended and approved by the Board from time to time.
- 4.11 “**Preservation**” means maintenance of Documents and Records in usable form and in good order, to prevent them from being damaged or destroyed or tampered with.
- 4.12 “**Record**” includes the information maintained either in physical form or Electronic form or both.

Capitalised terms used in this Policy and not defined above shall have the same meaning as assigned to them under the CA 2013 or LODR 2015 or any other applicable law or guidelines.

5. Scope

These guidelines will be valid for determining the preservation period and archival of various records including commercial and legal records maintained by the Company in compliance with the applicable laws and regulations and will apply to all locations of the Company.

6. Responsibility

The departmental head concerned will be responsible for the maintenance, preservation, and destruction of records pertaining to the respective Department.

7. Preservation Period

The preservation period starts with the conclusion of the financial year, in which the document has been formed, or the last entry was made; the preservation period of agreements starts with the end of the financial year in which the agreement period expires.

For determining the preservation period, the records are categorized into following three categories:

Category and Description	Period of Preservation
Records/documents with short reference value “i.e., Records, which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc.	Documents to be preserved for a period of 1 year to 8 years
Records/documents required to be maintained as per statutory requirements and having higher reference value “ i.e., records having contractual/legal implications, which need to be preserved for prescribed periods per statutory requirements; and records, which need to be preserved for a particular period according to Company’s own reference needs.	Documents to be preserved for a period of 8 to 12 years or permanently as prescribed under applicable law
Records which will have a permanent value for the Company even after the expiry of legal preservation period.	Permanent

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Records which are required for adducing evidence in judicial or quasi-judicial or other dispute redressal fora	Till the time the matters are finally disposed
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Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi-judicial fora and other mediation and alternate dispute fora, industrial, etc. are preserved according to specific needs and even beyond the prescribed period.

Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government/ Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

8. Preservation Location

The preservation location will be the concerned department. If the location is other than the department concerned, the same should be documented and kept in a file for reference purpose in the respective department. Documents that are required to be maintained at the registered office or any other place, as per applicable law shall be maintained at such place mandated under law.

In the case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire-proof or other such secure cabinets.

9. Mode of Preservation

Records/documents may be preserved either physically or in electronic form.

10. Website Disclosures

i. For events or information disclosed under Regulation 30(8) of LODR 2015:

The Company shall disclose events and information to the stock exchanges as required under Regulation 30(8) of the LODR 2015, and such disclosures shall be hosted on the website of the Company for a period of 5 (five) years.

ii. For disclosures made under other applicable laws:

All information required to be uploaded on the Company's website in pursuance of any other applicable law, shall be hosted on the Company's website for such period as may be mandated by the respective applicable law. In cases where the concerned applicable law does not prescribe any period, the required data shall be hosted on the website for a maximum period of 5 (five) years from the date of uploading or till it is relevant, whichever is later.

The information and disclosures as specified under (i) & (ii) above may be removed/deleted from the website after the end of such archived period and be placed in electronic archives permanently.

11. Destruction of Records

The records/documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal. A summary record of documents destroyed must be maintained by the department/officer concerned.

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This shall apply to both physical and Electronic Documents. The Documents may be destroyed as follows:

- i. Non-confidential paper records will be recycled;
- ii. Confidential paper records will be shredded or otherwise rendered unreadable; and
- iii. Electronic records will be deleted or otherwise destroyed.

12. Review and Amendment

The Board may at any time, amend this Policy either pursuant to any change in law or otherwise. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions in this Policy.

13. Detailed Version Control Sheet

This section is the control sheet of all the changes that have been carried out in the Policy and shall list the changes done since inception.

Change in version no.	Page no.	Section no.	Erstwhile section	New/Modified section	Reason for change