

LANCOR HOLDINGS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

I. PREAMBLE:

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 have been notified by Securities & Exchange Board of India on September 02, 2015, which shall replace the existing Listing Agreement entered by the Company with the Stock Exchanges on December 01, 2015.

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (Hereinafter called as “The Regulations”) every listed Company shall frame a policy for providing framework for adequate protection and preservation of the documents of the Company as per the applicable statutory requirements. This policy inter alia provides for preservation of documents where such preservation shall be of permanent nature as also documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

II. OBJECTIVE:

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

The policy is intended to define Lancor Holdings Limited preservation of documents responsibilities and to provide guidance to the executives and staff working in Lancor Holdings Limited in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frame the guidelines for fundamental accountability of Lancor Holdings Limited to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The Board may amend this Policy from time to time as they may deem fit and/or to incorporate any subsequent amendment(s)/modification(s) in the Listing Regulations with respect to matters covered under this Policy or otherwise

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III. DEFINITIONS

“**Board of Directors**” or “**Board**” means the Board of Directors of Lancor Holdings Limited as constituted/re-constituted from time to time.

“**Company**” means Lancor Holdings Limited.

“**Compliance Officer**” means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015

“**Director**” means a person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed as a Director in the Company.

“**Key Managerial Personnel**” shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.

“**Listing Regulations**” means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Policy**” or “**this Policy**” means Policy for Preservation of Documents.

“**Stock Exchanges**” means the stock exchanges where the Company’s shares are listed.

“**SEBI**” means Securities & Exchange Board of India.

The words, terms and expressions used in this Policy shall have the same meaning as given in Clause 2 of Chapter I of the Listing Regulations.

IV. GOVERNING LAWS

This policy shall be governed by the Companies Act 2013, SEBI Act, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws, Rules and Regulations made thereunder for the time being in force.

V. CLASSIFICATION OF DOCUMENTS:

- 1 Documents shall be classified in the following categories
 - a) Mandatory under governing laws
 - b) Non-Mandatory
- 2 Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in

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respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.

- 3 All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
- 4 Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

VI. PRESERVATION OF DOCUMENTS / RECORDS

Subject to clause V above, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors as the overseeing authorities deem fit.

a. Tax & Accounting Records:

Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues and expenses including capital expenditure. Tax records should be retained for at least eight years from the date of filing the applicable return or such period of time as prescribed under Tax laws whichever is later.

b. Employment Records/Personnel Records:

Labour laws require the Company to maintain certain recruitment, employment and personnel information. The Company should also maintain personnel files that reflect performance reviews if any and any complaints brought against the Company or individual employees under applicable labour laws. The Company should also keep all final Memorandum and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file.

- Employment and personnel records shall be preserved for a minimum period of eight years irrespective of whether such employee continues to be employed with the Company or not.
- Individual employee files need to be maintained as long as the concerned individual remains an employee of the Company as also for a minimum period of 5 years thereafter or such period of time as prescribed under respective laws for time being in force whichever is later.
- Returns under various Labour Laws, governmental and statutory filings etc. need to be retained in accordance with the related statute as may be specified therein or for a minimum period of 8 years.

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c. Financial Statements, Annual Reports, Annual Returns, Minutes, Statutory Registers & other Documents:

Financial Statements including Audit Reports, Minutes of Meetings of Board, Members and other Committees Meeting along with statutory registers as prescribed under governing laws for time being in force shall be preserved for such period as provided in respective laws. Any document where preservation period is not prescribed under governing laws shall be preserved permanently.

d. Press Releases/Public Filings.

The Company should retain copies of all press releases and documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities on a permanent basis.

e. Legal Files / documents:

All legal documents / copies of notices / summons / orders / judgments and all other legal documents shall be preserved permanently. Documents like leases, Leave & License agreements and other agreements shall be preserved for atleast 5 years beyond the life of the said documents.

f. Development/Intellectual Property and Trade Secrets:

Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the Company and are protected as a trade secret where the Company:

- i. Derives independent economic value from the secrecy of the information; and
- ii. The Company has taken affirmative steps to keep the information confidential.
The Company should keep all documents designated as containing trade secret information for at least the life of the trade secret.

g. Contracts:

Final, execution copies of all contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least five years beyond the life of the agreement, and longer in the case of publicly filed contracts.

h. Electronic Mail:

E-mail that needs to be saved should be either:

- i. Printed in hard copy and kept in the appropriate file; or
- ii. Downloaded to a computer file and kept electronically or on disk as a separate file so as to ensure its timely retrieval

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The concerned head of department shall keep in his custody the documents which are of important and/or confidential nature and list of the same shall be maintained in a Register to be kept in his/her custody and he/she shall be responsible for the preservation of the same. The said documents alongwith the Register shall be handed over by him/her to the successor in the event of such head of department leaving the Company/Department.

VII. DESTRUCTION OF DOCUMENTS:

- A) After the expiry of the preservation period specified in this policy, such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval of Chairman & Managing Director of the Company. The records of the documents destroyed shall be maintained by the concerned department and shall be produced whenever required by the concerned authority/auditors.
- B) In case any specific procedure is prescribed under applicable Act/Rule/Regulation/guidance note for destruction of the documents, the same shall be followed by the Company.
- C) Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed off finally.

VIII. ARCHIVAL OF DOCUMENTS

Documents mentioned in the Clause VI which are not required regularly can be archived by the concerned department in the following manner:

- 1. Documents to be archived should be kept in the storage locations earmarked by the Company for the purpose in secured place or cupboard having access only by the authorized personnel. If consider appropriate, services of external archival agencies may be utilized;
- 2. Documents should be boxed and the box should be labelled with the reference number and list of the files/documents. List of documents contained in the box should be kept inside the Box and shall also be kept by the concerned department;
- 3. Documents should be stored in a way that preserves their integrity and readability and restricts access to authorized personnel only;
- 4. The medium used to store documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available to the Auditors or Regulatory Authorities upon request;

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5. The concerned department head should maintain a record of documents archived, box reference number and storage location; and
6. Electronic records i.e e-mails, files etc. should be archived as per IT Policy of the Company

IX. DISCLOSURES

The Company shall disclose this Policy on its website and a web link thereto shall be provided in the Annual Report.