



**POLICY FOR PRESERVATION OF DOCUMENTS**  
**(Pursuant to Regulation 9 of the SEBI(Listing Obligations and Disclosure Requirements)**  
**Regulations, 2015)**  
**[CIN: L31300DN1961PLC000232]**

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**A) PREAMBLE:**

IMP Powers Ltd. (“**Company**”) is engaged in the manufacture of Power, EHV, Distribution Transformers up to 315 MVA in 400 kv class and has entered into the elite league of manufacturers of 400 kv transformers in the country. The Company is registered under the erstwhile Companies Act, 1956 and is professionally managed having good corporate governance and internal control systems in place.

The equity shares of the Company are listed on the BSE Limited and National Stock Exchange of India Limited.

**B) BACKGROUND, APPLICABILITY AND PURPOSE:**

Securities and Exchange Board of India (“SEBI”) vide notification dated September 02, 2015 has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”) which has become effective from December 01, 2015. These regulations are applicable to the Companies whose securities including specified securities (i.e. equity shares and convertible securities) are listed on the recognized stock exchange(s).

Regulation 9 of the said Regulations requires every listed entity to have a policy for preservation of documents (“Policy”) approved by its Board of Directors classifying them in at least two categories as follows:

- i. documents whose preservation shall be permanent in nature; and
- ii. documents with preservation period of not less than eight years after completion of the relevant transactions.

The purpose of this Policy is to lay down the underlying basic principles governing identification and classification of documents (maintained pursuant to applicable laws/rules/regulations) belonging to the Company for the purpose of secured retention.

The Board of Directors of IMP Powers Ltd. has adopted this Policy on February 14, 2017 which has come into effect from February 14, 2017

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

**C) DEFINITIONS:**

“**Board of Directors**” or “**Board**” means the Board of Directors of IMP Powers Ltd., as constituted/re-constituted from time to time.

“**Company**” means IMP Powers Ltd.

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



“SEBI” means Securities and Exchange Board of India.

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

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

**D) PRESERVATION OF DOCUMENTS/RECORDS:**

- I. The Company needs to maintain records, either in paper or in electronic form(as permitted by relevant governing laws/rules/regulations), for such periods as may be prescribed from time to time by various regulatory authorities, details of which are enclosed herewith as “**Annexure A**”.
- II. It shall be the responsibility of the concerned head of department to keep the annexed documents updated from time to time to ensure that it is in compliance with the various Acts/Rules/Regulations applicable to their respective departments and for this purpose, they shall communicate any changes desired in the aforesaid enclosure to the Company Secretary.
- III. The concerned head of department shall keep in his/her 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 along with the Register shall be handed over by him/her to the successor in the event such head of department leaving the Company/Department.

**E) DESTRUCTION OF DOCUMENTS:**

- I. After the expiry of the preservation period specified in the enclosed Schedule, such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval of the Chairman/Vice-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.
- II. In case any specific procedure is prescribed under applicable Act/Rule/Regulation for destruction of the documents, the same shall be followed by the Company.
- III. 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.



**F) ARCHIVAL OF DOCUMENTS:**

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

- i. 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.
- ii. List of documents should be maintained by the concerned department containing the record of documents archived along with the storage location.
- iii. Documents should be stored in such a way that preserves their integrity and readability and restricts access to authorized personnel only.
- iv. 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.
- v. Electronic records i.e. emails, files, folders, etc. should be archived as per the Policy of the Company.

**G) DISCLOSURES:**

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

<b>Sr. Nos.</b>	<b>Type of Document(s)</b>	<b>Preservation Period(s)</b>	<b>Concerned Department(s)</b>
1.	Certificate of Incorporation, Certificate of name change	Permanent	Secretarial
2.	Statutory Registers including Register of Members and Index of Members	Permanent	Secretarial
3.	MCA Forms	Permanent	Secretarial
4.	Scrutinizers Reports, Annual Reports and Financial Statements	Permanent	Secretarial
5.	Annual Returns	8 Years	Secretarial
6.	Attendance Register	8 years	Secretarial
7.	Office copies of board agenda, notes on agenda and general meeting notice and related papers	8 years	Secretarial
8.	Journal Entry support data	8 years	Accounts
9.	Annual Plans and Budgets	4 years	Accounts
10.	Books of Account, Ledgers and Vouchers	8 years from the end of financial year or completion of assessment under Income Tax whichever is later	Accounts
11.	TDS records, Income Tax and Service Tax papers	8 years from the end of financial year or completion of assessment under Income Tax whichever is later	Accounts
12.	Court Orders	Permanent	Legal
13.	Legal Memoranda and Opinion including subject matter files	3 years after the closure of matter	Legal
14.	Litigation files	3 years after close of the litigations	Legal
15.	Contracts, Agreements and related correspondence	8 years after termination or expiration of contracts	Legal
16.	Payroll Registers	8 years	HR
17.	Bonus, Gratuity and other statutory records	8 years	HR
18.	Time Office records and leave records	3 years	HR
19.	Employees information records	8 years after separation	HR
20.	Factory License and Permissions	Permanent	Works
21.	Purchase Order and related correspondence	3 years from the end of the financial year	Purchase