

SAINT-GOBAIN SEKURIT INDIA LIMITED
RECORD RETENTION AND DESTRUCTION POLICY

1) Purpose and Scope:

The purpose of the policy is to ensure the maintenance of necessary records and documents, including original documents and reproductions, of Saint-Gobain Sekurit India Limited (“the Company”), in accordance with all applicable laws and regulations. The policy is framed for the purpose of systematic retention and destruction of documents received or created in the course of business. The policy would have guidelines on identification of documents to be retained, retention period and destruction of the same.

2) Documents covered:

This Policy applies to all official records both paper document and electronic records generated in the course of the Company’s operations.

3) Administration:

- a) The Record Retention Schedule has been approved by the Board of Directors for initial maintenance, retention and disposal of physical records.
- b) The Chief Financial Officer shall appoint a Records Administrator whose duty will be to administer this policy and implement reasonable processes and procedures concerning the Record Retention Schedule.
- c) The Records Administrator will arrange for every officer and employee of the Company, who may have control over or is responsible for the Company’s documents, to be informed about this Policy.

4) Suspension of record disposal in event of litigation or claims:

In case a document or record is associated with any litigation or investigation or audit concerning the Company, disposal of documents shall be suspended until such time as the Administrator, with the advice of the concerned authorities including counsel, determines otherwise. The Administrator shall take such steps as are necessary to promptly inform all concerned employees of any suspension in the further disposal of relevant documents.

5) Confidentiality and Ownership:

All records are the property of the Company, and employees are expected to hold all business records in confidence and to treat them as the Company’s assets. Records must be safeguarded and may be disclosed to parties outside of the Company only upon proper authorization. Any court order or other request for documents received by employees, or questions regarding the release of the Company’s records, must be directed to the Records Administrator prior to the release of such records. Any records of the Company in possession of an employee must be returned to the employee’s supervisor or the Records Administrator upon termination of employment.

6) Policy review:

The Policy shall be subject to review as may be deemed necessary and in accordance with any regulatory amendments.

Annexure I

	ORGANISATIONAL RECORDS	
S.No.	Record Type	Retention Period
1.	Annual Audit Reports and Financial statement	10 years
2.	Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal)	Permanent
3.	Minutes Book (Board and all committees)	10 Years
4.	Register of Members	Permanent
5.	Registers and records maintained under the Companies Act and other statutes (other than stated above)	Permanent
6.	License and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent
7.	ROC Filings and Stock Exchange filings in physical and Electronic form	10 Years
8.	Policy and Procedure Manuals	Permanent – with revision history
9.	Original Purchase/Sale/Lease agreements relating to Property	Permanent
10.	Trade Mark Registrations, Patents, Copy rights	Permanent
11.	Disclosures as per Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 or as amended from time to time hosted on the website of the Company	5 Years

	ACCOUNTING & FINANCE RECORDS	
S.No.	Record Type	Retention Period
1.	General Ledger of Accounts	10 years
2.	Bank Reconciliations	10 years
3.	Accounts Payable ledgers and schedules	10 years
4.	Accounts Receivable ledgers and schedules	10 years
5.	Annual Plans and Budgets	5 years
6.	Quarterly Financial Statements (Original)	5 years
7.	Investment Records	Permanent
8.	All other Accounting and Finance records of the Company including invoices, bills	10 years
9.	Cost Records	10 years
10.	Insurance Policies	10 years
11.	Insurance claim files	10 years

	TAX & STATUTORY RECORDS	
S.No.	Record Type	Retention Period
1.	Tax-Exemption Documents and related correspondence	10 Years
2.	Excise, Service Tax and Customs records	10 Years
3.	Payroll Tax records	10 Years
4.	Tax Bills, Receipts, Statements	10 Years
5.	Tax Returns – Income, Franchise, Property	10 Years
6.	Sales Tax Records	10 Years

7.	Annual Information Returns – State and Central	10 Years
8.	Employee Statutory deduction records	10 years

Note: Tax records will be archived for 10 years and at the end of 10th year shall obtain confirmation from the tax consultants for retaining the same beyond 10 years.

	PERSONNEL RECORDS	
S.No	Record Type	Retention Period
1.	Payroll Registers (Gross and Net)	3 years
2.	Time Cards / Sheets	3 years
3.	Unclaimed Wage Records	3 years
4.	Leave Records	3 years
5.	Retirement Records	Permanent
6.	Personnel Files of individual employees	5 years post retirement/resignation of the employee
7.	application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers	5 years post retirement/resignation of the employee
8.	Employment Contracts – Individual	5 years post retirement/resignation
9.	Payroll Deductions	3 years