

**Fedders Electric and Engineering Limited**  
*(Formerly Fedders Lloyd Corporation Limited)*

**POLICY ON PRESERVATION OF DOCUMENTS**

## PREAMBLE

This policy is primarily based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations') and is intended to ensure compliance thereof.

Regulation 9 of the aforesaid Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:

- a) documents whose preservation shall be permanent in nature given in **Annexure 1**;
- b) documents with preservation period of not less than eight years after completion of the relevant transactions given in **Annexure 2**.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that documents whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records and their retrieval.

Accordingly, the Board of Directors of Fedders Electric and Engineering Limited ("the Company") in its meeting held on 12 February, 2016 has approved and adopted this policy on preservation of documents.

## PURPOSE

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process. Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

## APPLICABILITY AND SCOPE

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

The Head of the Departments who are responsible for relevant areas of the Company's operations ("Responsible Officers") shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that are preserved / destroyed in accordance with the requirement of this Policy.

The period for Preservation of documents may be modified / supplemented from time to time to ensure that the Policy is in compliance with local, State and Central Laws. In the event of any contradiction in the Documents Preservation Schedule and the statutory provisions, the statutory provisions shall prevail. The Company expects from its Employees to understand and fully comply with this Policy.

## **DESTRUCTION OF DOCUMENTS**

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

## **COMPLIANCE**

Failure to comply with this Policy may result in disciplinary action. Questions about this policy may be referred to the Company Secretary.

## **AMENDMENTS TO THE POLICY**

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. as may be issued by relevant statutory authorities, from time to time. In case of any rule/ regulation, notification or any amendment etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

## Annexure 1

### **Documents whose preservation shall be permanent in nature**

<b>Sl. No.</b>	<b>Nature of Document</b>
1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited financial statements
5.	Minutes of General Meeting
6.	Minutes of Board Meeting
7.	Minutes of various Committee Meetings
8.	Material Agreements/Contracts
9.	Orders issued by Courts/Statutory bodies
10.	Investment Documents/proofs including certificates etc.
11.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

## Annexure 2

### **Documents with preservation period of not less than eight (8) years after completion of the relevant transactions**

<b>Sl. No.</b>	<b>Nature of Document</b>
<b>1.</b>	Books of Accounts
<b>2.</b>	Annual Return(s)
<b>3.</b>	Insurance Policies/ Claims under various policies
<b>4.</b>	Correspondences with Departments/shareholders
<b>5.</b>	Non-Statutory Registers/Documents
<b>6.</b>	All Emails received from Internal and External Sources related to business issues
<b>7.</b>	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.