

ADC INDIA COMMUNICATIONS LIMITED
POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) mandate the listed entities to formulate a Policy for preservation of documents. In compliance with this Listing Regulation this Policy for Preservation of Documents ("Policy") is being framed and implemented. This Policy has been adopted by the Board of Directors of the Company at their meeting held on January 22, 2016.

2. OBJECTIVE OF THE POLICY

This Policy identifies documents received or created in the course of business that needs to be maintained and contain guidelines for how long certain documents should be retained. Basically this Policy classify the documents received or created in the course of business and to be maintained in two categories i.e. (i) documents which need to be preserved permanently and (ii) documents which need to be preserved for a specific period of time.

3. POLICY

The corporate records of the Company include essentially all papers and electronic records required to be maintained under any law or rules or regulations for the time being in force. These records include but not limited to memoranda, contracts, emails, reports, case study, interoffice correspondence regarding business transactions, accounting and tax records.

The law requires the Company to maintain certain types of corporate records either permanently or for a specified period of time. Failure to retain the records could subject the Company and the employees to serious legal consequences and seriously disadvantage the Company in litigation.

The Company expects all employees to fully comply with this Policy. Failure to comply with this Policy may result in disciplinary action against the employee.

If an employee has reasons to believe, or the Company informs the employee concerned, that Company records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then the employee must preserve those records until the Legal or Respective Department determines that the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records. If an employee(s) believe that exception may apply, or has any question regarding the possible applicability of that exception, he/she may contact the concerned departmental head.

Several Categories of documents that bear special consideration are identified below. While minimum retention periods are suggested, the retention of the documents not included in the identified categories should be determined by the Head of Department as he may deem fit.

a. **Board of Directors Records**

Minutes of meetings of the Board of Directors and Committees of the Board should be retained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board should be retained for a period of at least five (5) years.

b. **Books of Accounts**

Books of Accounts with all supporting documents should be retained for a period of at least eight (8) years following the completion of the relevant transactions.

c. **Tax Records**

Tax records include, but are not limited to documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim of tax authorities etc. Tax records should be retained for a period of at least eight (8) years from the completion of assessment year for which the records pertains to.

d. **Employment /Personnel Records**

Several Central and State statues require the Company to maintain certain documents relating to recruitment, employment and personnel information. These records also reflect performance reviews and any other matters arising during the course of employment such as complaints brought against the company or individual employees, actions taken by or against personnel.

- i. Employment and personnel records should be retained for a minimum period of eight (8) years irrespective of whether such employee continues to be employed with the Company or not.
- ii. Individual employee files need to be maintained as long as the concerned individual remains an employee of the Company and for a period of three (3) years following cessation of employment or such period of time as prescribed under respective laws for time being in force whichever is later.
- iii. All Statutory filings under various statues should be retained in accordance with the related stature as may be specified therein or for a period of eight (8) years whichever may be later.

e. **Press Releases and Public Filings**

Press Release shall include, but shall not be limited to, any intimation given to the press regarding financial results, profits, Meetings of the Board, General Meetings, and overall performance of the Company. The Company should retain all Press Releases for at least five (5) years. All events, information and documents filed with the stock exchanges, Registrar of Companies and other regulatory authorities on a permanent basis.

f. **Legal Records**

Legal records include but not limited to legal opinions, pleadings, Orders passed by any court or tribunal or any authority, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter. 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 at least five (5) years beyond the life of the said documents.

g. Contracts

Copies of all contracts entered into by the Company should be retained for a period of at least five (5) years after the expiry or termination of the contracts.

h. Intellectual Property Records

Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Documents pertaining to Intellectual Property Rights that are owned by the Company shall be retained for the life of such intellectual property rights.

i. Electronic Mail

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

- a. Printed in hard copy and kept in the appropriate file; or
- b. Downloaded to a computer file and kept electronically or on disk as a separate file.

Electronic documents will be retained as if they were paper documents. Therefore, the electronic files should be maintained for the appropriate amount of time depending upon the subject matter of the email. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods should be tested on a regular basis.

4. AMENDMENTS TO THE POLICY

The policy should be reviewed periodically by the Senior Management/Head of Department and amendments effected subject to approval of the Board if and when practical difficulties are encountered. The Senior Management/Head of the Department may also review the policy in order to comply with any local, state and central legislations that may be promulgated and applicable to the Company from time to time.