



MAITHON POWER LIMITED

Policy for Preservation of Documents

**Approved by: Board of Directors
Date: 29th January 2016**

For Maithon Power Limited

A handwritten signature in blue ink, appearing to read 'P Shirke', is written over a horizontal line.

**Poonam Shirke
Company Secretary**

MAITHON POWER LIMITED**Policy for Preservation of Documents****1. Background**

1.1 Maithon Power Limited (the "Company") is guided by various legal, regulatory and statutory requirements as applicable from time to time, with regard to record keeping, record retention and destruction of obsolete records. The records are to be maintained based on the type and kind of records in a manner so as to comply with all applicable Acts, Rules, Regulations and Guidelines, and the retention periods indicated therein.

1.2 Further, Regulation 9 the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Regulations") requires the Company to have a Policy for preservation of documents.

1.3 In view of the above, the Company has framed this Policy for Preservation of Documents (the "Policy").

2. Objective of the Policy

2.1 The objective of this Policy is to classify documents 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 viz. more than 8 (Eight) years and less than 8 years.

3. Scope of the policy

3.1 This Policy covers records retained at the Company's own locations and/or at the locations of the Registrars/Transfer Agents appointed by the Company.

4. Key features

4.1 The corporate records of the Company are important assets. Corporate records include essentially all records, whether on paper or in electronic form.

4.2 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 employees and the Company to penalties and fines, cause the loss of rights, obstruct justice, adversely impact potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

4.3 The Company expects all employees to fully comply with this Policy, provided that all employees should note the following general exception to any stated destruction schedule:

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

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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 believes that exception may apply, or have any question regarding the possible applicability of that exception, he/she may contact the Head – Legal Department/Company Secretary.

4.4 From time to time the Company establishes retention or destruction policies or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property. While minimum retention periods are suggested, the retention of the documents identified in those schedules and of documents not included in the identified categories should be determined by the Head of the Department, primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

4.5 Broadly, there are two kinds of Company records - **Temporary** and **Retained**.

4.5.1 TEMPORARY RECORDS

Temporary records include all business documents that are intended to be superseded by final or permanent records, or which are intended to be used only for a limited period of time, including, but not limited to written memoranda and dictation to be typed in the future, reminders, to-do lists, reports, drafts, and interoffice correspondence regarding a client or business transaction.

Temporary records can be destroyed or permanently deleted if in electronic form when a project or matter closes, subject to approval of Departmental Head and after seeking advice from the Head – Legal Department/Company Secretary.

4.5.2 RETAINED RECORDS

Retained records include all business documents that are not superseded by modification or addition, including but not limited to documents given (or sent via electronic form) to any third party not employed by the Company, or to any government agency; final memoranda and reports; correspondence; handwritten telephone memoranda not further transcribed; minutes; specifications; journal entries; cost estimates; etc.

4.6 Record Retention Schedule

4.6.1 Each Head of the Department shall identify and at all times maintain a schedule of temporary and retained documents.

Records as per the Companies Act, 2013 and SEBI Regulations

The Company shall maintain all records as per the Companies Act, 2013, the various Rules thereunder and SEBI Regulations as prescribed therein. If no period is prescribed therein, the said records shall be retained for not less than 8 (Eight) Years.

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 made by the relevant tax authorities. Tax records shall be retained as prescribed in the various direct and indirect tax regulations. If no period is prescribed therein, the said records shall be retained for a period of 8 (Eight) years or for 8 years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be.

Employment /Personnel Record

The Company is required to keep certain documents relating to recruitment, employment and personnel information, performance review, action taken by or against any employee, complaints by or against any employee. These documents shall be retained as prescribed in the various statutes and regulations. If no period is prescribed therein, the said records shall be retained permanently or for a period of 8 (Eight) years after cessation of employment for any reason, as deemed fit.

Press Releases

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 shall retain all Press Releases permanently.

Legal Documents

Legal Documents shall include, but shall not be limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgements, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, documents relating to property matters.

All contracts shall be retained for a period of 8 (Eight) Years or for 8 (Eight) Years after the expiry of the term of the contract, whichever is higher.

Documents relating to any property owned by the Company shall be retained perpetually. Other property documents shall be retained for a period of 8 (Eight) Years or for a period of 8 (Eight) Years after the rights in such property cease to exist, whichever is higher.

Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded shall be retained permanently. Interim Orders shall be retained till a Final Order is received or for a period of 8 (Eight) Years, whichever is higher.

Pleadings shall be retained for a period of 8 (Eight) Years or till the matter has been disposed, whichever is higher.

Intellectual Property documents and Licenses

Intellectual Property documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights documents that are owned by the Company shall be retained by the Company permanently. Licenses shall be retained till the time of the validity of the License and for a period of 8 (Eight) Years thereafter or for a period of 8 (Eight) Years, whichever is higher.

Treasury related documents

Documents related to fund raising, investments, forex hedging and all treasury related activities shall be retained as provided in the concerned legislation/regulation. If there is no legislative provision, the same shall be retained for a period of 8 (Eight) years from the date of completion of activity/transaction.

All other documents or records not covered above shall be retained as provided in the concerned legislation/regulation. If there is no legislative provision, the same shall be maintained for a period of 8 (Eight) years.

RECORD MAINTENANCE AND STORAGE

All physical records are maintained by the respective Department at the respective locations. All electronic versions of records are maintained within the Company's centralized electronic record software database, which is maintained by the IT Department.

5. Disposal of records

5.1 After the period specified in the concerned statute/regulation/this policy is over, the documents/records may be destroyed as provided hereunder:

5.1.1 Physical records:

- a) Records maintained in physical form may be destroyed, unless required to be preserved for any purpose, such as ongoing litigation or regulatory directive. The concerned Department Head in consultation with Head-Legal Department/ Company Secretary, will authorize destruction of the records and the same will be destroyed in the presence of a person authorized for the purpose, who shall ensure their destruction in accordance with practices that preserve the security of the information contained in them. The Department will maintain a list of the records so destroyed, which shall be signed by the person authorized as above.

5.1.2 Electronic records:

- a) Records maintained in electronic form may be deleted, unless required to be retained for any purpose, such as ongoing litigation or regulatory directive. The concerned Department Head in consultation with Head-Legal Department/ Company Secretary, will authorize the deletion of the records. The Department will maintain a list of the records so deleted, which shall be signed by the person authorized for the purpose.
- b) The IT Department shall maintain a procedure to delete records no longer required to be retained, from back-up servers and for appropriately purging emails no longer required to be maintained.

5.1.3 Regulatory provisions:

Where the law provides for any specific procedure for destruction of any records, it shall be ensured that such procedure is followed.

6. **Hold on Records' Destruction and Deletion**

6.1 If a lawsuit or other proceeding involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, must cease immediately. Documents relating to the lawsuit or potential legal issue will then be retained and organized under the supervision of the Head – Legal Department/ Company Secretary. Violation of this aspect of the Company's Document Retention Policy could subject the Company and the employees involved to civil and criminal penalties.

In the event of a 'Document Hold' Direction, the IT Department shall immediately disable the "permanent delete" and "automatic delete" functions of the Company's software with respect to the designated records and disable the automatic deletion of Recycle Bins and Deleted items folders on appropriate Company computers; the Department shall immediately suspend all disposal of records maintained on-site or off-site location as appropriate; and the Head – Legal Department/Company Secretary shall immediately notify all appropriate employees by e-mail that they are not to dispose of relevant Temporary Records or other records until notified otherwise.

E-mail Policies

All electronic communication systems as well as all communications and stored information transmitted, received, or contained on the Company's information systems are the property of the Company. Employees using this equipment for personal purposes do so at their own risk. All files containing important and price sensitive information must have a password. Employees have no expectation of privacy in connection with the use of Company equipment or with the transmission, receipt, or storage of information using the Company's equipment. Authorized Company personnel may access communications and stored information at any time without notice or consent.

E-mails not archived will be automatically deleted within 365 days. Employees should avoid using Company e-mail for personal purposes. Personal e-mails should be deleted as soon as possible.

E-mails relating to audit work papers and financial controls should be retained for at least 8 years.

All emails to the Company's Officers or Audit Committee relating to complaints on auditing, accounting, frauds or internal controls should be retained permanently.

Any messages exchanged between the Company and third parties (such as consultants and auditors) should be archived, regardless of their content. Instant messages have the same status as e-mails and should be treated identically.

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On transfer to another assignment or cessation of employment for any reason whatsoever, the employee must copy the mail archive and hand it over to the Department Head.

7. Review of Policy

7.1 This Policy has been adopted by the Board of Directors of the Company and the Board may review and amend the Policy, as and when required to do so due to regulatory changes or under any other circumstances necessitating revision to the Policy.

8. Effective Date

8.1 This Policy, as approved by the Board of Directors, shall be effective from January 29, 2016.