



POLICY ON PRESERVATION OF DOCUMENTS

1. Preface:

The Board of Directors (the "Board") of Today's Writing Instruments Limited (the "Company") has adopted the following policy (the "Policy") with regard to preservation of documents of the Company.

This Policy has been formulated in accordance with the Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. Objective of the Policy:

This Policy provides for the systematic review, retention and destruction of documents received or created in the course of business. This Policy aims to identify documents that need to be maintained and contains guidelines for how long certain documents should be kept and how they should be destroyed.

3. Effective Date:

This Policy is effective 1st December, 2015.

4. Administrator:

The Company has nominated the Compliance Officer of the Company as the Administrator in charge of this Policy.

His/her responsibilities will be to supervise the retention and destruction of documents in accordance with the Document Retention Schedule annexed hereto and recording the actions taken to retain and/or destroy them.

The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

5. Other responsible parties:

The Company's Directors, officers, staff and consultants shall assist Administrator in compliance with this Policy.

When a responsible party leaves the Company, he/she is expected to return and/or destroy all documents pertaining to the Company and/or any other information, as may be determined by the Administrator.

6. Electronic documents:

The Administrator may establish standards for document integrity, including guidelines for handling electronic files, backups, archiving documents and checking the reliability of the system.

7. Procedure for disposal of Documents:

Documents shall be preserved as per the time schedule prescribed in Annexure A. The documents of the Company which are no longer required as per the time schedule prescribed in the Annexure A can be destroyed. The Administrator shall direct the employees in charge from time to time to destroy the documents which are no longer required as per the Documents Retention Schedule given under Annexure A hereto.

The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by employees who are disposing of the documents in the format prescribed at Annexure B.

8. Suspension of Documents disposal in the event of Litigation or Claims:

In the event the Company is served with any notice for documents from any of the Statutory Authorities or any litigation is commenced by or against the Company, then the disposal of documents that are the subject matter of such notice/litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of.

The Administrator shall immediately inform all employees of the Company for suspension of further disposal of such documents.

9. Communication of this Policy:

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

10. Amendment:

Any change in the Policy shall be approved by the Board of Directors of the Company.

11. Scope and Limitation:

In the event of any conflict between the provisions of this Policy and the Companies Act, 2013, Listing Regulations or any other statutory enactments, the relevant act, the provisions of such Companies Act, 2013/Listing Regulations or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

Annexure A: Document Retention Schedule	
A. ACCOUNTING AND FINANCE	
Record Type	Retention Period
Accounts Payable ledgers and schedules	7 years
Accounts Receivable ledgers and schedules	7 years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Annual Plans and Budgets	2 years
Bank Statements and Canceled Cheque	7 years
Employee Expense Reports	7 years
General Ledgers	Permanent
Interim Financial Statements	7 years
Notes Receivable ledgers and schedules	7 years
Investment Records	7 years after sale of investment
Credit card records (documents showing customer credit card number)	2 years
B. CONTRACTS	
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination
D. CORRESPONDENCE AND INTERNAL MEMORANDUM	
<p>General Principle: Most correspondence and internal memorandum should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file. Correspondence or memorandums that do not pertain to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:</p>	
<p>1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded <i>within two years</i>. Some examples include:</p>	

- Routine letters and notes that require no acknowledgment or follow-up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.
- Formal letters that require no follow-up.
- Letters of general inquiry and replies that complete a cycle of correspondence.
- Letters or complaints requesting specific action that have no further value after changes are made or action taken (such as name or address change).
- Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.
- Chronological correspondence files.

Please note that copies of interoffice correspondence and documents where a copy will be in the originating department file should be read and destroyed, unless that information provides reference to or direction to other documents and must be kept for project traceability.

2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

E. ELECTRONIC DOCUMENTS	

1. **Electronic Mail:** Not all emails need to be retained, depending on the subject matter.
 - All e-mails—from internal or external sources—are to be deleted after 12 months.
 - Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.
 - All business-related email should be downloaded to a service center or user directory on the server.
 - Staff will not store or transfer related e-mail on non-work-related computers except as necessary or appropriate for the Company.
 - Staff will take care not to send confidential/proprietary information to outside sources.
 - Any e-mail that staff deems vital to the performance of their job should be copied to the staff's specific folder, and printed and stored in the employee's workspace.
2. Electronic Documents: including Microsoft Office Suite and PDF files. Retention also depends on the subject matter.
 - **PDF documents** – The length of time that a PDF file should be retained should be based upon the content of the file and the category under the various sections of this policy. The maximum period that a PDF file should be retained is 6 years. PDF files the employee

deems vital to the performance of his or her job should be printed and stored in the employee's workspace.

- **Text/formatted files** - Staff will conduct annual reviews of all text/formatted files (e.g., Microsoft Word documents) and will delete all those they consider unnecessary or outdated.

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F. INSURANCE RECORD

Summaries	10 years
Adjustments	3 years after final adjustment
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Group Insurance Plans - Active Employees	Until Plan is amended or terminated
Group Insurance Plans – Retirees	Permanent or until 6 years after death of last eligible participant
Inspections	3 years
Insurance Policies (including expired policies)	Permanent
Support Data	7 years
Loss Runs	10 years
Releases and Settlements	25 years

G. MISCELLANEOUS

Consultant's Reports	2 years
Material of historical value (including pictures, publications)	Permanent
Policy and Procedures Manuals – Original	Current version with revision history
Policy and Procedures Manuals - Copies	Retain current version only
Annual Reports	Permanent

H. PAYROLL DOCUMENTS

Employee deduction authorizations	4 years after termination
Payroll deductions	Termination + 7 years
Form 16	Termination + 7 years
Labor Distribution Cost Records	7 years
Payroll Registers (gross and net)	7 years
Time Cards/Sheets	2 years

Unclaimed Wage Records	6 years
I. PERSONNEL RECORD	
Commissions/Bonuses/Incentives/Awards	7 years
Employee Earnings Records	Separation + 7 years
Employee Handbooks	1 copy kept permanently
Employee Medical Records	Separation + 6 years
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	6 years after separation
Employment Contracts – Individual	7 years after separation
Employment Records - Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision
Employment Records - All Non-Hired Applicants (including all applications and resumes - whether solicited or unsolicited, results of post-offer, pre-employment physicals, results of background investigations, if any, related correspondence)	2-4 years (4 years if file contains any correspondence which might be construed as an offer)
Job Descriptions	3 years after superseded
Personnel Count Records	3 years
J. PROPERTY RECORDS	
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
Original Purchase/Sale/Lease Agreement	Permanent
Property Insurance Policies	Permanent
K. TAX RECORDS	
General Principle: Must keep books of account or records as are sufficient to establish amount of gross income, deductions, credits, or other matters required to be shown in any such return.	

These documents and records shall be kept for as long as the contents thereof may become material in the administration of state, and local income, and property tax laws and such other authorities.	
Tax-Exemption Documents and Related Correspondence	Permanent
Rulings	Permanent
Excise / Customs Tax Records	7 years
Payroll Tax Records	7 years
Tax Bills, Receipts, Statements	7 years
Tax Returns - Income, Property etc.	Permanent
Tax Workpaper Packages - Originals	7 years
Sales/Use Tax Records	7 years
Annual Information Returns -	Permanent
Income Tax or other Government Audit Records	Permanent
L. PROGRAM AND SERVICE RECORDS	
Attendance records	7 years

<u>M. LEGAL & COMPLIANCE:</u>	
Legal contracts	Permanent
Property documents	Permanent
Court orders	Permanent
Minutes of Board Meetings, General Meetings and Committee Meetings	Permanent
Statutory Registers	Permanent
License, Certificates and Permissions	Permanent
Statutory Forms except for routine compliance	Permanent
Scrutinizers Reports	Permanent
Register of Members	Permanent
Index of Members	Permanent
Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
Disclosures received from Directors	8 years
Board Agenda and supporting documents	8 years

Attendance Register	8 Years
Office copies of Notice of General Meeting and related papers	8 Years
Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8 Years
Documents relating to litigation	8 years after close of litigation
N. OTHER DOCUMENTS:	
Other documents	As may be decided by the Head of the Department with due regard to the statutory requirement, if any

Annexure B: Register for disposal of Records

Sr. No.	Particulars of documents destroyed	Date and mode of destruction with the initials of Secretary or other authorised person