

ASSOCIATED ALCOHOLS & BREWERIES LIMITED

Regd Office: 106A Shyam Bazar Street, Kolkata - 700005

(CIN: L15520WB1989PLC047211)

ASSOCIATED ALCOHOLS & BREWERIES LIMITED POLICY ON PRESERVATION OF RECORDS

Corporate Office: 4th Floor, BPK Star Tower, A.B. Road Indore -452008

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1. PREAMBLE

This Policy is formulated in terms of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. OBJECTIVE.

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in following categories as follows:

Sr. No.	Particulars	Type
1	Documents whose preservation shall be permanent in nature;	Doc 1
2	Documents with preservation period of not less than eight (8) years after completion of the relevant transactions.	Doc 2
3	Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case	Doc 3
4	Documents like budget papers, bank guarantees etc., which may be retained for less than 8 years	Doc 4

Provided further that the Company may keep the documents as specified above in electronic mode.

3. PRINCIPLE RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENT-

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain documents pertaining to their area.

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4. TYPE OF RECORD

A. Accounting and Finance Records

Record Type	Retention Period	Document Type
Annual Audit Reports and Financial Statements, Tax and Vat Audit	Permanent	Doc 1
General Ledger	Permanent	Doc 1
Investment Records	Permanent	Doc 1
Fixed Asset Register	Permanent	Doc 1
Tax Litigation documents	Permanent	Doc 1
Interim Financial Statements	8 years	Doc-2
Notes Receivable ledgers and schedules	8 years	Doc-2
Cost records	8 years	Doc-2
TDS, PF, ESI return and Challan	8 years	Doc-2
Accounts Payable ledgers and schedules	8 Years	Doc-2
Accounts Receivable ledgers and schedules	8 years	Doc-2
Bank Guarantees	Till the expiry of the claim period	Doc-4
Security deposit receipt copies	3 years after termination of the contract	Doc-4

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B. INSURANCE RECORD

Record Type	Retention Period	Document Type
Annual Loss Summaries	8 Years	Doc-2
Group Insurance Plans -Active Employees	8 Years	Doc-2
Group Insurance Plans - Retireees	8 Years	Doc-2
Insurance Policies for the Company	8 Years	Doc-2
Journal Entry Support Data	8 Years	Doc-2
Releases and Settlements	8 Years	Doc-2

C. TAX RECORDS

Record Type	Retention Period	Document Type
Excise Tax records	Permanent	Doc-1
Tax Assessment Orders.	8 year	Doc-2
Tax Returns	8 year	Doc-2
Sales Tax Records	8 year	Doc-2
Service Tax Records	8 year	Doc-2
Tax-Exemption Documents and related correspondence	8 year	Doc-2

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D. CORPORATE RECORDS INCLUDING CERTIFICATE OF INCORPORATION, LISTING AGREEMENT AND OTHER APPROVALS FROM OTHER STATUTORY AUTHORITIES.

Record Type	Retention Period	Document Type
Memorandum and Article of the Company, Register of Member and Charges, Minutes of Board Meeting and Minutes of General Meeting, Common Seal, Annual Report.	Permanent	Doc-1
Annual Financial Results, Quarterly Results.	8 year	Doc-2
ROC Filings and Stock Exchange filings in physical and Electronic form	8 year	Doc-2

E. LEGAL FILES AND RECORDS

Record Type	Retention Period	Document Type
Court Orders	Permanent	Doc-1
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent	Doc-1
Original Purchase / Sale Deeds	Permanent	Doc-1
Original Lease Agreements	3 years after expiration of the lease	Doc-3

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Litigation files	1 year after expiration of disposal of the case	Doc-3
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F. PERSONNEL AND HR RECORDS

Record Type	Retention Period	Document Type
Retirement and Pension Records	Permanent	Doc- 1
Personnel Files of individual employees	Permanent	Doc- 1
Commission / Bonuses / Incentives / Awards	2 years	Doc- 4
Employee Medical Records	2 years	Doc- 4
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers.	2 years	Doc- 4
Employment Contracts - Individual	2 years	Doc- 4
Time Cards	2 years	Doc- 4
Leave Records	2 years after the relevant period	Doc- 4

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G. Miscellaneous Records

Record Type	Retention Period	Document Type
Consultant Reports	3 years	Doc- 4
Policy and procedures manuals - Original	Current Version with revision of Historic Version	Doc- 4
Export Documentation	8 years	Doc- 4
Import Documentation	8 years	Doc- 4
Research & Publications	3 years	Doc- 4

5. DESTRUCTION OF DOCUMENT

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both physical and electronic documents

The temporary documents, excluding the current document(s) shall be destroyed after the relevant or prescribed period, by the Authorized person in whose custody the documents are stored, after the prior approval of the Board or any other authority as required under the applicable law pursuant to which the documents have been preserved.

A register of the documents destroyed shall also be maintained. It shall state the brief particulars of the documents destroyed, date of disposal / destruction and the mode of destruction. The entries in the register shall be authenticated by the authorized person.

The format of the register of documents destroyed

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Particulars Of Document Along with Provision Of Applicable Law	Date And Mode Of Destruction	Initials of The Authorized Person

6. GENERAL

Notwithstanding anything contained in this Policy, the Company shall ensure to comply with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

7. AMENDMENT

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

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