



CIN: L25209UP1971PLC003444

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POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS IN ITS WEBSITE

1. Purpose and Scope

The policy on preservation and archival of documents is mandated by the provisions of Regulation 9 of Chapter III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”). With this policy, the Company intends to safeguard significant documents and preserve them to ensure durability of documents including documents in electronic form.

This policy may be reviewed by the Board of Directors and amendments made, to comply with any requirements under any statute or regulation, from time to time.

2. Classification of documents-

A) Permanent Preservation:

- 1) Minutes of the meetings and all other statutory records including documents and forms filed with Ministry of Corporate Affairs under Companies Act, 2013.
- 2) All documents filed with SEBI / Stock Exchanges.
- 3) All documents filed with Tax Authorities in Income Tax, Service Tax, VAT & similar tax authorities.
- 4) All permits, licenses, authorization from any statutory authorities.
- 5) Audited Accounts
- 6) Any other document required to be preserved permanently under any law / statute.

B) Preservation for 8 years:

- 1) Bank, cash vouchers, payment vouchers, warrants
 - 2) Bank statements
 - 3) Purchase bills
 - 4) Sales invoices, Debit / credit notes, etc.
 - 5) Accounting records
 - 6) Any documents related to correspondence with Customs at CFS
 - 7) Any other documents required to be preserved for 8 years under any law /statute.
- C) Other Documents may be stored and preserved in physical form/ electronic form, after the completion of the relevant transactions, for such period as may be required, in each case.

3. Correspondence and Internal Memoranda

General Principle: Most correspondence and internal memoranda shall be retained for the same period as the document they pertain to or support.

1. Those pertaining to routine matters and having no significant, lasting consequences may be discarded within two years.
2. Those pertaining to non-routine matters or having significant lasting consequences should be generally preserved permanently.

4. Electronic Documents including email retention and back up

A. Electronic Mail:

- 1) All e-mail – from internal and external sources to be deleted after they cease to be of current use, depending on the subject matter.
- 2) Employees should keep emails related to current business issues.
- 3) I.T Department would archive email for 7 years on email archival server after the employees have deleted it, post which time the email will be permanently deleted.

4) Employee will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the respective Head of Department.

5) Employees will take care not to send confidential/proprietary information to outside sources

6) Any e-mail deemed vital by the Employees to the performance of their jobs should be copied to the employee's specific folder and/or printed and stored in the employees workplace.

B. Web page files

1) All such events / information hosted on the Company's website shall be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.

2) After the initial period of 5 years, documents / information (except documents of permanent nature) shall be archived by the I.T. department for a further period of 3 years.

3) Documents of permanent nature, uploaded on the Company's website, shall be archived by the I.T. Department.

Responsibility:

The responsibility for preservation of the documents will be on the concerned department Heads.

Head – IT will be responsible for all the documents preserved in electronic mode