

# **MAHAAN FOODS LIMITED**

## **Document Retention Policy**

## **1. DOCUMENT RETENTION**

Document retention means the manner of retaining the Company's documents and the time period up to certain documents are to be retained by the company and the time period when such documents can be allowed to be purged.

## **2. APPLICABILITY**

This policy shall be applicable to all employees of Mahaan Foods Limited.

## **3. LEGAL REQUIREMENT**

The law requires the Company to maintain certain types of corporate records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject you and the Company to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage to the Company in litigation.

## **4. COMPLIANCE OBLIGATIONS**

Documents shall never be destroyed in response to or in anticipation of an investigation or audit. Contact the Legal & Compliance Department if there is any doubt about the appropriateness of document destruction. A 'legal hold' suspends all document destruction procedures in order to preserve appropriate records under certain circumstances, such as litigation or government investigations. Legal & Compliance Department determines and identifies what types of Company's records or documents are required to be placed under a legal hold. Every employee must comply with this requirement. Legal & Compliance Department will notify employees if a legal hold is placed on records for which they are responsible. If employees have any questions about this they shall contact Legal & Compliance Department.

From time to time the Company may establish 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 and cost management.

## **5. TYPES OF DOCUMENTS THAT ARE CONSIDERED NECESSARY UNDER STATUTORY REQUIREMENTS FOR THE PURPOSE OF DOCUMENT RETENTION**

The following types of documents are considered to be preserved and maintained as per specific periods provided under the respective statutes. This shall include the documents to be preserved of permanent nature and documents to be preserved for specific periods.

- a. Corporate Records such as Board and Committee materials, Shareholder meeting materials, Documents relating to Shareholders
- b. Certificates and Licenses obtained for operations of the Company
- c. Employment records
- d. Financial books and records
- e. Tax records
- f. Press releases and Public filings
- g. Sales and Marketing documents
- h. Contracts
- i. Intellectual Property
- j. Others (as may be decided by the Functional Head in consultation with the legal department from time to time.)

Retention period for each of the above documents and any other documents that may be identified for this purpose in consultation with Functional Heads, shall be finalized and circulated as an internal guideline jointly by the Company Secretary and the Chief Financial Officer.

## **6. GENERAL GUIDELINES**

### **i) Responsibility**

Each employee is required to fully comply with any published records retention or destruction policies and schedules. Functional Heads are responsible for ensuring that records under their jurisdiction are retained in accordance with the record retention policy. Documents Retention Policy must be adhered to since they provide the authority for destroying Company records. Each and every document needs to be identified for the period up to which it is required to be preserved. Current records to also have such identification.

### **ii) Litigation**

If the document is in any way related to pending or threatened litigation, the said document shall be retained as per instruction from Legal and Compliance department.

## **7. ELECTRONIC COPIES AND METHODS OF EMAIL RETENTION**

Electronic copies of the message are legally no different than paper copies. Electronic documents includes- e-mail, spreadsheets, database reports, power point presentation, graphics, websites, word processing document etc. The guidelines for determining retention period for electronic records shall be the same as that for physical records. If hard copies are

required in order to comply with litigation, discovery obligations etc. electronic copies too shall be kept.

The length of time an e-mail should be retained depends on the content. The retention period for emails shall follow the standards prescribed by Information Risk Management group. There are many messages delivered by e-mail that actually are "records," and these almost certainly need to be kept for the same period as the physical records. Such email records take the form of contract drafts, offer letters, trade orders and the like.