

TIMESCAN LOGISTICS (INDIA) LIMITED
POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

(Framed under Regulation 9 and Regulation 30(8) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015)

BACKGROUND

SEBI vide Notification dated September 2, 2015 has notified Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, provides that:

The listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:

(a) documents whose preservation shall be permanent in nature;

(b) documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Regulation 30 (8) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, provides that:

The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

Pursuant to these Regulations, Timescan Logistics (India) Limited (“the Company” or “TSL”) has a strategic objective of ensuring that significant documents as specified in this Policy are safeguarded and preserved to ensure longevity of such documents.

Therefore, to ensure compliance with the aforesaid Regulations, the Company hereby frames the Policy for Preservation of Documents & Archival of Documents pertaining to events/ information disclosed to stock exchange in its website, which is mentioned below:

DEFINITIONS

In this Policy, unless the context otherwise requires:-

“Board of Directors” or **“Board”** shall mean the Board of Directors of the Company, as constituted from time to time.

“Company” or **“TSL”** means Timescan Logistics (India) Limited formerly known as Timescan Logistics (India) Private Limited.

“Documents” refers to papers, records, files, tapes, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences challans, CDs, DVDs, electronic storage devices, audio/video recordings or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.

“Electronic Form” means any electronic device such as servers, computer, laptop, compact disc, pen drive, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“Maintenance” means keeping documents, either physically or in Electronic Form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

“SEBI Listing Regulations” means Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Words and expressions used in this Policy but not defined shall have the meaning as given in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Any subsequent modification and/or amendments brought about by SEBI in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 shall automatically apply to this Policy.

EFFECTIVE DATE

The Policy, as approved by the Board of Directors, shall be effective from 27th Januray, 2021.

PURPOSE AND SCOPE

The purpose of this document is to present a high-level policy statement for the Company regarding preservation of its documents in accordance with all the statutory and regulatory provisions applicable including the Companies Act, 2013 and SEBI Listing Regulations.

This policy would contain guidelines on identification of documents that needs to be maintained; duration of retaining certain documents; expiry of such documents, archival of certain documents and disposal thereof, if no longer needed pursuant to the applicable statutory and regulatory provisions.

CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

The Board of Directors has classified the documents to be retained and preserved in two categories which are mentioned below:

- 1) Documents whose preservation shall be permanent in nature:
 - As prescribed under Companies Act, 2013 & Rules made there under.

2) Documents with preservation period of not less than 8 years after completion of relevant transactions:

- As prescribed under Companies Act, 2013 & Rules made there under.

Income Tax, Goods and Services Tax and Customs Act related documents, i.e., Assessment Orders, Tax Bills, Receipts, Statements, Returns, Notices, etc shall be preserved for a period of 8 years as required under the applicable laws.

Details pertaining to the list of documents to be preserved under the above-mentioned applicable laws and regulations have been provided to the respective departments to ensure safe record keeping and compliance of the applicable laws and regulations.

SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case the Company is served with any notice for request of documents or a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, then disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. Such documents shall be preserved until the completion of the judicial proceedings.

REGISTER OF DOCUMENTS DESTROYED

The records/ documents preserved shall be reviewed every year or according to the need of the respective departments and actions taken to destroy those records, which are due for disposal wherever required, approval of Board will be taken for disposal of certain documents.

The company shall maintain a register in the form set out in the **Annexure** enclosed hereto wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Company Secretary or such other persons as may be authorized by the Board for this purpose.

This register of disposal of records shall be maintained permanently by the Company with the assistance of the Company Secretary and Compliance Officer either in physical or electronic form.

ARCHIVAL OF DOCUMENTS

The Company shall disclose on its website all such events or information which has been disclosed to stock exchange under Regulation 30(8) of the SEBI Listing Regulations and such other disclosures shall be hosted on the website of the Company for a minimum period of five years.

The Company shall disseminate the information specified in Regulation 46 of SEBI Listing Regulations on its website.

MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form. Electronic version(s) of all of records are to be maintained within the Company's centralized electronic record software database, which is maintained by the IT Services Department.

AUTHORITY TO MAKE ALTERATION TO THE POLICY

The Board of Directors are authorized to make such alteration to this policy as considered appropriate, however, subject to the condition that such alteration shall be in accordance with applicable laws, including the provisions of the Companies Act, 2013, as amended (**the "Companies Act"**) and the SEBI Listing Regulations, 2015.

PERIODICAL REVIEW OF THE POLICY BY THE BOARD OF DIRECTORS

The TSL Policy for Preservation of Documents and Archival policy shall be reviewed periodically by the Board and amendments effected subject to the approval of the Board if any and when practical difficulties are encountered. The Board may also review this policy on document retention to comply with any local, state, and central legislation that may be promulgated from time to time.

In case of any subsequent changes in the Companies Act, 2013 or SEBI Listing Regulations which makes any of the provisions in the Policy inconsistent with the Regulations, the provisions of the Act or Regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

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REGISTER OF DOCUMENTS DESTROYED

Sr. No.	Section/Rules in Companies Act, 2013	Description of document destroyed	Time upto which document was preserved	Date of Destruction	Mode of destruction	Initials of Company Secretary or other authorized person