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POLICY FOR PRESERVATION OF DOCUMENTS (“The Policy”)

1) Preamble and Applicability:

This policy is framed by the Company pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 to ensure adequate preservation and storage of all important and relevant information and documents pertaining to the Company.

2) Definitions:

- (i) “**Act**” means The Companies Act, 2013 including any statutory modification or re-enactment thereof.
- (ii) “**ATFL**” means Agro Tech Foods Limited.
- (iii) “**Board**” means the Board of Directors of Agro Tech Foods Limited.
- (iv) “**Regulations**” means the Listing Regulations as notified under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- (v) “**Financial Year**” shall have the same meaning as assigned to it under Section 2(41) of the Companies Act, 2013.
- (vi) “**Electronic Form**” means documents which have been generated, scanned and uploaded on the Document Management system (DMS) of the Company.
- (vii) “**Document Management System (DMS)**” is part of the Microsoft Share Point Portal and is hosted in house at the Registered Office. It is Active Directory (AD) integrated and hence, all employees of the company who have valid AD and email accounts can access the portal. The URL of the portal comes automatically in the favourites section of Internet Explorer on each employee’s computer as “Document Management System”.
- (viii) “**Centralised Document Warehouse**” means the storage location currently situated at Kothur, Telangana where all the records are to be stored handling of which is done either directly by the Company or with the help of a third party vendor.

3) Basis of the Policy for Preservation of Documents

This Policy lays down the basis for Preservation of Documents of ATFL and related issues as specified under Regulation 9 of the Listing obligations and Disclosure requirements.

- (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 ;
- (c) documents which are to be preserved due to ‘litigation hold’ ;

(d) documents which shall be preserved in electronic form.

On the basis of the above, ATFL shall provide for preservation of its documents.

4) Handling of Documents:

It is imperative that ATFL handles all its documents with care. If handled well, it will help the company to retrieve the documents in case of any disputed legal cases, assessments (direct and indirect tax), for any audit purpose and for any other investigation or inquiry. As per law, the company's documents need to be stored for at least 8 completed financial years. This is applicable to all subsidiaries of the Company as well. Filing and tracking of each subsidiary should be separate and easily identifiable. Apart from this, certain documents need to be stored permanently whose life is co terminus with the existence of the Company as such.

A. DOCUMENTS WHICH SHALL BE PRESERVED PERMANENTLY

The following nature of documents shall be preserved permanently by the Company. These could be preserved either at the Registered office of the Company in the fire proof safe or at the Storage Facility, currently at the Kothur Factory site, depending on the validity of the document :

1. All original Certificates of Registration like, Certificate of Incorporation issued by ROC or any subsequent modifications thereof, PAN, TIN, VAT, Excise, IEC, etc.
2. All original Licences and approvals issued for either operating the Company or any of its Factories or units, including in the nature of Product approvals, Trade Mark, Copyright, Patent and design registrations, .
3. All original title deeds of the properties owned or held by the Company, including all their back up papers like Due diligence documents, non-encumbrance certificates, chain link documents to the current title deeds, Adangal / Pahani copies duly updated, land usage conversion papers, etc.
4. All other investments made by the Company, including share / mutual fund certificates etc, except those which have not been disposed off.
5. Minutes of all the Board, its Committees and Annual General / Extraordinary General Meeting Minutes and the backup papers.
6. Notwithstanding the above, scanned copies of all the above documents shall be uploaded on the DMS of the Company and be available to relevant stakeholders depending on the function they operate.

B. DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

The following nature of documents shall be preserved for at least eight years after completion of the relevant transaction. These could be preserved either at the Registered office of the Company or at the Storage facility, currently at the Kothur Factory site, depending on the validity of the document:

1. The current financial year's records will be stored in the Registered office. Each sub vertical viz. Accounts Payable, Accounts Receivable, COGS, General Ledger, Treasury, Legal and Secretarial, tax (direct and indirect), Payroll, Trust and IS (Infra and ERP) will collect all their records every month and give it for binding to the binder. Once bound, these records will be kept in the allocated cupboards by each sub vertical. Within 15 days of the end of the Board Meeting in which the annual results are declared, the completed financial year's records which are stored in office will be sent to the centralized document warehouse at Kothur. All Documents of previous financial years' for a period of at least 8 years will be stored and available for retrieval at the Kothur warehouse.
2. All Registers to be maintained by the Company under the Companies Act, Income Tax Act, VAT Act, Customs and Excise Acts, SEBI and all other applicable statutes of the Company, Audit Reports including limited review reports provided under any one or all of the above statutes.
3. All contracts / agreements, MOU's, Letter of Intent executed by ATFL. If the tenure of the contracts / agreements is greater than eight years, then the contracts/ agreements to be preserved for the life of the contract / agreement and for a period of eight years thereafter.
4. All correspondence between the Stock Exchanges, SEBI, ROC, Registrar and Share Transfer Agent and any regulator under the relevant jurisdiction.
5. All papers relating to ongoing tax assessments / years for which assessment has not started or is pending closure for direct taxes (income tax, transfer pricing, wealth tax etc.) and indirect taxes (VAT, excise, customs, entry tax, APMC etc.) and for a period of at least 6 years after completion of the assessment in any of the assessments.

The process of documenting the documents and preparing them for preservation and storage generated at the Registered Office, Corporate Office, Factories, Cold Storages, depots, Regional Offices shall be as per the latest Standard Operating Procedure (SOP) applicable for the Document Management System.

Provided that where an electronic version of a document is retained, documentation does not need to be retained in paper form unless required by applicable laws, regulation or as a consequence of a document preservation requirement arising from a claim or circumstance. This however, shall require prior approval of the Reporting Manager and Head of the Function in conjunction with the applicable SOP.

C. DOCUMENTS WHICH ARE TO BE PRESERVED DUE TO 'LITIGATION HOLD'

ATFL shall ensure that all documents, especially potential legal case documents are prepared, filed, retained, preserved and retrieved to defend the Company effectively. The following nature of documents could be preserved either at the Registered office of the Company or at the Storage facility, currently at the Kothur Factory site till the pendency of the dispute or litigation, depending on the validity of the document:

1. All the live legal case files shall be kept at either the Registered Office or the Corporate office depending on the location of the dispute.

2. All matters for which the Management feels that there could be a potential litigation with a party / vendor / client etc, shall mark the documents of the relevant party / vendor / client as 'LITIGATION HOLD'. The documents pertaining to these matters shall be carefully preserved to handle the litigation effectively.
3. All the live litigation matters for the Direct / Indirect Tax matters shall be kept at either the Registered Office or the Corporate office depending on the location of the dispute.

D. DOCUMENTS WHICH SHALL BE PRESERVED IN ELECTRONIC FORM.

The Document Management System is part of the Microsoft Share Point Portal and is hosted in house at RO. It is AD integrated and hence, all employees of the Company who have valid AD and email accounts can access the portal. The URL of the portal is reflected automatically in the favourites section of Internet Explorer on each employee's computer as "Document Management System". Folders have been created by function and access has been given function wise. All employees of Finance, IS, and Legal have access to Finance, IS, and Legal folders. All SOPs will be in the Finance folder. All tax papers (direct and indirect) will be in Finance folder. All legal contracts / agreements/ MOU'S will be in Legal folder. When a new version of the same file is added e.g. a new version of an existing SOP is released, then the person must add it as a new version to the existing line in the DMS. S/he should not create a new line item in DMS for the new version of an existing line item. Moreover, the old version should not be deleted from DMS.

Each folder (Finance, IS, and Legal) will have sub folders as follows:

- FY 11 – signifying the period from 1st April 2010 to 31st March 2011
- FY 12 – signifying the period from 1st April 2011 to 31st March 2012
- FY 13 – signifying the period from 1st April 2012 to 31st March 2013 and so on.
- The Finance folder will also have a sub folder for SOP.
- Under each sub folder (viz. FY 11, FY 12 etc.) of the Legal folder, sub folders for each function will be opened for each year and that years' agreements stored in that function's folder. The Legal folder will also have sub folders for IPRs, property documents, licences, and share certificate to store the respective documents.

Provided also that the records of all the documents mentioned in Points A,B, C above may be kept in electronic mode.

E. Notwithstanding the above, ATFL shall take steps to preserve any other document/information as may be specified by the Board from time to time.

After the completion of the stipulated period for preservation, the Manager – SSC shall, after taking prior approval of the head of the function to which the document pertains, the CFO, the Head of Legal, if it is a legal document or a 'litigation hold' document, the relevant tax manager, if it is a direct or indirect tax matter, get the documents / files which are stored either at the Central document warehouse or any other location or facility of the Company, destroyed using appropriate methods / technology like shredding, burning under controlled conditions etc, or any environment friendly method and ensure that no information of any kind, especially

confidential information, is accessible to any third party after such destruction. The process of destruction could be handled either directly by the Company or outsourced to a credible and reputed third party after entering into a relevant confidentiality agreement. A list of destroyed documents may be maintained for information of the relevant stakeholders.

5) Amendment

The Company reserves the right to amend or modify this Policy in whole or in part, at any point of time. Any amendment to applicable Regulations or statutes governing this policy shall become automatically applicable to this Policy and shall have an overriding effect to the extent the same may be applicable to a particular provision in the Policy. Pursuant to such amendments or modifications, the Company Secretary shall carry out the necessary changes to this Policy, as may be required.