



BHARAT GEARS LIMITED

Gearred for Life

***POLICY ON PRESERVATION OF DOCUMENTS/ARCHIVAL
POLICY ON WEBSITE DISCLOSURE***

Preface

The Board of Directors (the "Board") of Bharat Gears Limited (the "Company") has approved the following Policy ("The Policy") of the Company for preservation of Documents/Records maintained by the Company either in Physical Mode or Electronic Mode including those which are disclosed on the website of the Company (hereinafter referred to as "the Documents"). This Policy has been formulated in accordance with the Regulation 9 and Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

1. Introduction

In the current world of communication, information and records constitute one of the most valuable assets of an organisation. The information content today co-exists in physical and electronic form. In this context, it is imperative to have an integrated information system with clear objectives for the sound management of electronic and paper archives.

Bharat Gears Limited ('BGL' or 'the Company') recognizes the importance of preservation of documents & records and considers it as one of the fundamental tool for an organization to conduct its business operations effectively.

2. Preamble

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, ("Listing Regulations"), every listed company is required to have a policy for preservation of documents & records. As per Regulation 30, all information disclosed to stock exchange(s) by a listed company is required to be hosted on its website for a minimum period of five years and thereafter as provided in its archival policy.

To comply with the above applicable requirements and in order to ensure good system for preservation and archival of documents & records, either in Physical Mode or Electronic Mode including those which are disclosed on the website of the Company, the Board of Directors of the Company has adopted this policy (hereinafter referred to as "the Policy") which shall be called "Preservation of Documents and Archival Policy".

3. Objective

The key objective of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory



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requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also adopted for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

4. Scope

- This policy shall apply to all documents which include records maintained in the form of books or stored in a computer or tapes or discs or in any other electronic form or transcribed information of any type whether expressed in ordinary or machine language.
- The preservation of documents, as mandated under the policy, shall apply to all documents regardless of its location, including all Company locations, off-site locations, computer storage or employee's laptops etc.

5. Definitions

"Applicable Law" means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the Documents has been prescribed.

"Archive/archiving" is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information.

"Board", means Board of Directors of the Company.

"Company" means Bharat Gears Limited.

"Compliance Officer" means Compliance Officer pursuant to Regulation 6 of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

"Documents" refers to all corporate records which include papers, files, registers, writings, memos, manuscript, communications, agreements, sale deed, conveyance licenses, opinions, press releases, circulars, judgments, orders, approvals, registration certificates, building plans, etc. generated or received or maintained by the Company in the course of its business either in physical form or in electronic form produced by a computer or by any other device but not limited to emails and attachments, scanned papers, word documents, presentations, spreadsheets, databases, pictures, graphics.

"Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of



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storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise accessible to the Company.

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

6. Effective Date

This policy shall be effective from 01 December, 2015.

7. Preservation of Documents & Records

Attached as **Appendix A** is a 'Documents Preservation Schedule' that is approved as the schedule for maintenance, preservation and disposal of the documents either in Physical Mode or Electronic Mode.

The Compliance Officer ('the Administrator') of the Company, shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorized to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

8. Disclosure of Information/Documents on the website of the Company

The Company shall at all times maintain a functional website. The website shall contain information about the Company, its business, all press releases, key contact details etc. and shall also contain such information, documents, disclosures etc. as are prescribed under various statutes to be uploaded on it. Except where the law provides for a definite time period all archived documents of the Company shall be preserved for a period of 5 years and are required to be published on the website of the Company.

Thereafter, the same shall be transferred to the "Past Information/Events" section till such time as may be instructed by the Directors or the Compliance Officer of the Company. However, in case of any updation in disclosure of such published record, the older record can be removed from the website of the Company.

However, the backup of the information and/or documents which are removed from main website shall be preserved for a minimum period of 3 years and thereafter can be deleted/disposed-off permanently from the server.



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9. Destruction of documents & records

After the expiry of minimum period as may be applicable, such documents & records either in electronic mode or physical mode, may be disposed-off by the respective departments/divisions. The respective authorised person responsible for destruction shall ensure that documents & records are disposed-off in an effective manner that leaves no possibility for reconstruction of the records and information contained therein.

In case any specific procedure is prescribed under applicable Act/Rule/Regulation for destruction of the documents, the same shall be followed by the Company.

Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed off finally.

However, it be noted that all confidential records shall be destructed only after the approval of the Directors or the Compliance Officer of the Company.

The modes of destruction of records shall include (but not limited to) the following:

- Confidential paper records - shall be destroyed by making them unreadable.
- Non-confidential paper records - shall be sold to waste-paper dealers or recycled.
- Electronically stored records - shall be erased or destroyed with the help of the Computer Department.
- Destruction of magnetic media records such as pen drives - shall be destroyed by reformatting the same at least once.
- Destruction of optical media records such as rewritable disks - shall be destroyed by cutting, crushing or other physical means.

The details of the Documents destroyed, shall be recorded in the Register to be maintained by the authorized person within the respective department therein.

10. Roles & Responsibilities of Departmental Heads

- a. The Departmental heads must be familiar with this policy and educate their department in this regard.
- b. They shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.



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- c. They must restrict access to the confidential records and information.
- d. They must coordinate in the destruction of the records when required.

11. Limitation and Amendments

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

The policy has been initially approved by the Board of Directors of the Company on 01 December, 2015 and further, amended on 24 January, 2025 to incorporate the necessary changes as deemed necessary.

DISCLAIMER

Nothing contained in this Policy shall operate in derogation of any law for the time being in force or of any other regulation in force.

In any circumstance where the terms of this Policy differ from any Applicable Law governing the Company, such Applicable Law will take precedence over this Policy and procedures until such time as this Policy is modified in conformity with the Applicable Law.

APPENDIX "A" – DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is organized as follows:

Section Topic

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Correspondence and Internal Memo
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records



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A: Corporate Records		
Sr.No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Common Seal	Permanent
2.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3.	Statutory Registers	Permanent
4.	License and Permissions	Permanent
5.	Statutory Forms except for routine compliance	Permanent
6.	Scrutinizers Reports	Permanent
7.	Register of Members	Permanent
8.	Index of Members	Permanent
Documents to be retained for a minimum period of 8 years		
9.	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
10.	Board Agenda and supporting documents	8 years
11.	Attendance Register	8 Years
12.	Office copies of Notice of General Meeting and related papers	8 Years
13.	Office copies of Notice of Board Meeting/ Committee Meeting, Agenda, Notes on Agenda and other related papers	8 Years
Miscellaneous		
14.	Register of Debenture-holders, if any	15 years after the redemption of debentures
15.	Index of debenture-holders, if any	15 years after the redemption of debentures



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B: Accounts and Finance		
Sr.No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Annual Audit Reports and Financial Statements	Permanent
Documents to be retained for a minimum period of 8 years		
2.	Annual Plans and Budgets	8 years after completion of Audit
3.	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
4.	Investment Records	8 Years
Miscellaneous		
5.	General Correspondence	3 years

C: Tax Records		
Sr.No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Tax Exemption and Related documents	Permanent
Documents to be retained for a minimum period of 8 years		
2.	Income Tax papers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
Miscellaneous		
3.	Income Tax papers related to Foreign Assets	16 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
4.	Excise Records	5 years from the end of the Financial Year or completion of assessment under the applicable law is over



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		whichever is later
5.	Service Tax papers	5 years from the end of Financial Year or completion of assessment under Service Tax whichever is later

D: Legal Files and Records		
Sr.No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Court Orders	Permanent
Documents to be retained for a minimum period of 8 years		
2.	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts
Miscellaneous		
3.	Legal Memoranda and Opinions including subject matter files	3 years after the close of matter
4.	Litigation files	3 year after close of the Litigations

E: Property Records		
Sr.No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Original Purchase and Sale Agreement	Permanent
2.	Property Card, Index II, Ownership records issued by Government Authority	Permanent
Miscellaneous		
3.	Property Insurance	3 years



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F: Project		
Sr.No.	Record Type	Preservation period
Miscellaneous		
1.	Project Documents and Related correspondence (including any proposal of the Project and its approval)	3 years
G: Correspondence and Internal Memo		
Sr.No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Those pertaining to non-routine matters or having significant lasting consequences	Permanent
Miscellaneous		
2.	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. • Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; • Letters of general enquiry and replies that complete cycle of correspondence; • Letter of compliant requesting specific actions that have no further value after change of name or address; • Other letters of inconsequential subject matter or that definitely close	3 years



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	correspondence to which no further reference will be necessary.	
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H: Insurance Records

Sr.No.	Record Type	Preservation period
Miscellaneous		
1.	Insurance Policies	3 years
2.	Claims records	Till settlement is over and claim money is received
3.	Group Insurance Plans	Until plan is amended or terminated

I: Personnel Records

Sr.No.	Record Type	Preservation period
Documents to be retained for a minimum period of 8 years		
1.	Payroll Registers	8 years
2.	Bonus, Gratuity and other Statutory Records	8 years
3.	Time office Records and Leave Cards	8 years
4.	Unclaimed Wages Records	8 years
5.	Employees Information Records	8 years after separation
6.	Employees Medical Record	8 years after separation

J: Electronic Records

1. Electronic Mail

- All e-mails received from Internal and External Sources may be deleted after 8 years.
- Employees will strive to keep their e-mails related to business issues.
- All Emails related to business issues should be downloaded to a server or user directory on server.
- Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.
- All e-mails of Employees which are important should be copied to the employees' folder.

2. Web Page Files : Internet cookies

All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.



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The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy.

Each month the Company will run backup copy of all Electronic files including email on servers. This backup is safeguard to retrieve lost information within 1 year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.

In certain cases document will be maintained both paper and electronic form.

For **Bharat Gears Limited**

Surinder Paul Kanwar
(Chairman and Managing Director)