POLICY ON MAINTENANCE, PRESERVATION & ARCHIVAL OF DOCUMENTS

As per Regulation 9 and 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

(As approved by Board of the Company in its 595th meeting held on 30th May, 2018)
I. BACKGROUND:

Regulation 9 of Chapter III of the Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, requires every listed Company to frame a policy on preservation of documents. Further, Regulation 30 (8) requires the Company to frame a policy, on website disclosure and archival of such disclosure.

In compliance to the aforesaid regulations, this policy is framed for the purpose of systematic, categorization, maintenance, retention of documents received or created in the course of business of Housing and Urban Development Corporation Limited (HUDCO) hereinafter referred as “Company”.

II. SCOPE:

This Policy is applicable to all the Documents (whether physical and/or electronic) generated by the employees of the Company within the scope of their official duties. It is to help the employees in handling the Documents efficiently, carefully with the required degree of confidentiality. This policy also covers the various aspects of disposal/destruction of the documents.

III. DOCUMENTS TO BE PRESERVED:

This Policy sets the standards for preservation of documents of the Company, broadly classified in the following categories, which may be preserved, in physical and/or electronic mode.

a) Documents whose preservation shall be permanent in nature

Certificate of Incorporation, Memorandum & Articles of Association, Minutes of Board/General Meetings, Annual Reports and such other document, certificates, statutory registers that may be required to be preserved permanently in terms of the Companies Act, 2013, SEBI Regulations and/or under any other law in force, as amended from time to time, and under HUDCO the ‘Policy for weeding out of the old unwanted/redundant records’ dated 24th August, 1993, as amended from time to time

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

Books of Accounts, Annual Returns as defined in Companies Act, 2013, and such other documents that may require to be preserved for a period of not less than eight years after the completion of relevant transactions, in terms of the Companies Act, 2013, SEBI Regulations and/or under any other law in force, as amended from time to time, and under HUDCO the ‘Policy for weeding out of the old unwanted/redundant records’ dated 24th August, 1993, as amended from time to time

Any other document not covered above at a) and b) shall be preserved by the concerned department during the preservation period as decided by the respective head of function in line with the requirement of law, if applicable, and as prescribed under the Companies Act, 2013, SEBI Regulations and/or under any other law in force amended from time to time.
Notwithstanding para herein above, the documents shall also be preserved to meet the requirement under the regulations in the following manner:

(i) Where there is a period for which a document is required to be preserved as per applicable law, for the period required by the applicable law, and under HUDCO the 'Policy for weeding out of the old unwanted/ redundant records' dated 24th August, 1993, as amended from time to time

(ii) Where there is no such requirement as per applicable law, then for such period till the document remains "Current".

(iii) In case of any other document, for such period, as the respective functional head decides after taking a considered view about its relevance, with the recommendation of the Functional Director and approval of Chairman & Managing Director.

IV. CUSTODY OF DOCUMENTS:

All documents shall be under the custody of concerned functional head(s).

V. DESTRUCTION OF DOCUMENTS:

After retention period, concerned functional head with the recommendation of the concerned Functional Director and approval of the Chairman & Managing Director, shall decide the records which are to be destroyed. A list of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. Before destruction of documents, the concerned head of department may opt for preserving copies of the same in Electronic Form.

VI. ARCHIVAL POLICY:

The policy applies to documents/ information hosted on the website of the company including events/information required to be disclosed on website under SEBI Regulations. The disclosure of material events shall be hosted and retained on the Company’s website for a minimum period of 5 (five) years. Thereafter depending upon the nature, materiality, impact and relevance of the material event/ information, the disclosure of such material event:

(i) Can continue to remain hosted on the Company’s website for a longer period of time on the advice of concerned functional head;

(ii) Can be removed from the website; or

(iii) Can be archived.

VII. AMENDMENTS TO THE POLICY:

The Chairman & Managing Director is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Regulation and other applicable laws.