

Document Retention & Archival Policy

(As adopted by the Board of Directors on December 01, 2015)

This Policy deals with the retention and archival of various documents of Winro Commercial (India) Limited ("Company")

Corporate Records

The Corporate documents (other than statutory records) are papers or electronic records including but not limited to contracts, emails, etc. of various functions of the Company. The Company shall retain all Corporate Records for such period as may be specified under the relevant statute.

Filing with Stock Exchanges

All press releases and filings with Stock Exchanges shall be maintained for a period of eight years from the date of release/filing. All events and press releases filed with the Stock Exchanges shall be maintained for not less than five (5) years on the website of the company and thereafter in archives of the Company for a period of three (3) years.

Statutory and other Records

- a) Minutes and Board related documents: minutes of meetings of the Board of Directors, Committees and shareholders shall be maintained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for a period of one (1) year.
- b) Statutory Registers and other documents pursuant to Companies Act: The Statutory Registers, filing with Registrar of Companies and other documents as required under the Companies Act, 2013 shall be retained as per the requirement of the Act.
- c) Books of Accounts and Tax Records: Books of Accounts and Tax Records should be retained for at least eight (8) years following the completion of the

relevant transactions or assessment year for which the records were last used or as per the requirement of the relevant statute.

- d) Employment Records: The Company maintains personnel records that include recruitment, employment, revision and personal information. These records should be retained for a period of one (1) year following the expiry or termination of employment. The employment records, which are statutory in nature shall be maintained as required under the relevant statute.
- e) Intellectual Property Records: Documents relating to the development and protection of intellectual property rights should be maintained for the life of such intellectual property right.
- f) Contracts: Execution copies of all contracts entered into by the Company should be retained for at least one (1) year following the expiry or termination of the contracts
- g) Judicial Orders: Judicial Orders shall be preserved permanently.
- h) Other Statutory records: The other statutory records as required under various statutes shall be retained as per the requirement under the relevant statute.

Policy Review

This Policy shall be subject to review as may be deemed necessary by the Board of Directors in accordance with any Regulatory amendments.