

ASHOKA BUILDCON LIMITED DOCUMENT RETENTION AND ARCHIVAL POLICY

1. Policy and Purposes

This Policy represents the policy of Ashoka Buildcon Limited (**the Company**) and all its Subsidiaries with respect to the retention and archival of the corporate and other records, both in hard copy and electronic media (hereinafter referred to as "documents").

Purposes of the Policy include (a) retention and maintenance of documents necessary for the proper functioning of the Company as well as to comply with applicable legal requirements; (b) destruction of documents which no longer need to be retained after specified period; and (c) guidance for the Board of Directors, officers, staff and other persons with respect to their responsibilities concerning document retention and archival of the documents.

2. Documents

Documents in hard copies i.e. physical records consisting of all hand written, typed, printed and signed books, papers, agreements, memoranda etc. maintained in paper form. It would include all the statutory registers, minute books, signed copies of financials, books of accounts including vouchers etc. and other statutory records. Electronic documents would include all the documents which are signed digitally and maintained in electronic form i.e. e-mail communication, statutory e-forms and returns filed online.

Each Department Head shall be the responsible for implementation/execution of this policy in respect of his Department. If he believes and/or it is the requirement of the Company that the documents may be required once litigation, an audit or any investigation is reasonably envisaged / anticipated.

There are certain documents which are required to retained / preserved for longer period of time as identified below.

| Document Type / Department | Retention Period |
|--|------------------|
| Accounting & Taxation | 8 years |
| Books of Accounts | 8 years |
| Bank Statements, Reconciliations & Deposit Slips | 8 years |
| Tax Records | Permanent |
| Annual Financial Statements and Audit Reports | Permanent |
| General Ledger | Permanent |
| Interim Financial Statements | Permanent |
| Secretarial | |
| Statutory Registers | Permanent |
| Minute Book | Permanent |
| Annual Return | Permanent |
| Statutory e-filings with MCA | Permanent |

| Corporate Filings with Stock Exchanges | 5 years |
|--|---------|
| | |

| HR Dept. | |
|--|-----------------------------------|
| Employee Personal Records | 3 years after the employment ends |
| Employee contracts | 3 years after termination |
| Retirement and pension records | Permanent |
| Legal and Contracts | |
| Contracts, related correspondence and other supporting | 10 yrs after termination |
| documentation | |
| Legal correspondence | Permanent |
| Intellectual Property Rights | Permanent |
| Property – Sale-purchase-lease deeds | Permanent |
| Property Tax Receipt / other levy receipts | 10 years |
| | |

The Company has made appropriate provision for the backup of its electronic/digital information / data including offsite storage facilities. The backup copies are maintained to ensure the retention and timely retireval of the reocrds.

Failure to comply with this policy may attract disciplinary or penal action against the employee including suspension, termination.

This Policy is effective from December 1, 2015.

The Policy may be reviewed periodically by the Management and changes/amendments be made subject to approval of the Board from time to time as deemed necessary to comply with prevailing Rules & Regulation, provisions of various Acts /Laws.
