

**KONKAN RAILWAY CORPORATION LIMITED  
(A GOVERNMENT OF INDIA UNDERTAKING)  
CIN U35201MH1990GOI223738**

**PRESERVATION OF DOCUMENTS AND THEIR  
ARCHIVAL POLICY**

*(AS APPROVED AT 169TH BOD MEETING HELD ON 10<sup>TH</sup> FEBRUARY, 2022)*

**REGISTERED AND CORPORATE OFFICE**

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**PRESERVATION OF DOCUMENTS AND THEIR ARCHIVAL POLICY OF  
KONKAN RAILWAY CORPORATION LIMITED**

**1. INTRODUCTION**

1.1 This Policy (hereinafter referred to as "the Policy") shall be called "Preservation of Documents and their Archival Policy" of Konkan Railway Corporation Limited (hereinafter referred to as "the Company").

1.2 This policy has been formulated in accordance with Regulation 9 of Chapter III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "SEBI Listing Regulations") which requires every listed Company to have a policy on preservation of documents.

1.3 The Policy further encompasses the manner of archival of the documents which have been disclosed on the website of the company in compliance of Regulation 51 (3) of the SEBI Listing Regulations.

1.4 The policy is in conjunction with any extant policy of the Company in the matter of Preservation of Documents / Records Retention and also subject to the provisions of other laws viz., Right to Information Act, 2005, The Public Records Act, 1993, etc., as applicable.

**2. OBJECTIVES**

2.1 The objective of the Policy is to ensure that all important documents, generated or received by the Company, are adequately maintained and preserved in compliance with the applicable statutory provisions and to facilitate destruction of documents that are no longer required, at an appropriate time, in specified manner.

2.2 The policy establishes the guidelines for management, retention, preservation and destruction of documents, both in physical form and electronic form by the Company.

### **3. SCOPE**

3.1 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.

3.2 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 employees' laptops etc.

### **4. DEFINITIONS**

a) "Applicable Law" means any law, rules, regulations, circulars, guidelines or standards applicable on the Company under which any guideline / provision with regard to the preservation of the Documents has been prescribed.

b) "Board" means the Board of Directors of KRCL, as constituted from time to time.

c) "Document(s)" means all papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers, files, books and or any other record (including required under or in order to comply with the requirements of any Applicable Law) maintained on paper or in Electronic Form and does not include multiple or identical copies.

d) “Electronic Form / Mode” means maintenance of documents in any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

e) “Maintenance” means keeping Documents, either physically or in electronic Form.

f) “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

All the Words and expressions used in this Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the Listing Regulations and in the absence of its definition or explanation therein, as per the Companies Act, 2013 including any statutory modification or enactment thereof and the Rules, Notifications and Circulars made/issued there-under, and as amended from time to time.

## **5. PRESERVATION SCHEDULE OF DOCUMENTS**

5.1 The Documents shall be preserved under following categories:

(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 transaction.

(c) Documents with preservation period specified by statutory authorities under applicable laws.

(d) Documents with preservation period specified under any other policy of the Company or duly approved by the Management / Functional / Strategic

Business Unit Head / Entity Head as per the business needs of the Company or Delegation of Authorities etc. subject to (a) to (c).

5.2 The Company may keep documents specified in clause 5.1 in electronic mode as may be permitted by law.

## **6. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE (CATEGORY A)**

6.1 All Documents as may be required under the applicable statute, laws, rules and regulations, namely but not limited to certificate of incorporation, memorandum and articles of association, permanent account number, tax deduction account number, excise/service tax/sales tax/export /import/ other registration certificates, licenses, court orders, awards, patents, trademarks, copy rights shall be preserved permanently.

6.2 Statutory records and registers that are required to be maintained permanently under the provisions of the Companies Act 2013 including Annual Financial Statements with Statutory Auditors Report, Annual Report.

6.3 Minutes of the Board Meeting, Board Committee Meetings, General Meetings of Members etc. shall be retained in perpetuity in the Company's minute book.

6.4 Documents relating to any property of the Company, property tax, Delegation of powers, all Policies / Policy Guidelines of the Company, framed under various regulations shall be retained perpetually.

## **7. DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION (CATEGORY B)**

7.1 The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All

modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

(a) Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI-LODR, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.

(b) Documents/Information submitted to Registrar of Companies / Ministry of Corporate Affairs in compliance with the Companies Act, 2013 & Rules thereunder shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is submitted.

(c) Books of Accounts as per Companies Act, 2013

(d) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013

(e) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-I on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.

(f) Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India.

(g) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.

(h) Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transactions under the Companies Act, 2013 and/or SEBI Regulations.

## **8. GENERAL (CATEGORY C)**

8.1 In addition to the documents mentioned in Category 'A' and 'B' above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the circulars issued in this respect from time to time or as per the applicable Statutory/ Regulatory provisions in this regard.

## **9. CUSTODY OF DOCUMENTS**

All documents shall be under the custody of concerned functional head(s). The respective Functional/ Department Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy, in respect of the areas of operations falling under their irrespective charge.

## **10. MODES OF PRESERVATION**

The Documents may either be preserved in Physical form and/or Electronic Form.

## **11. DESTRUCTION OF DOCUMENTS**

After the expiry of the retention period, concerned functional head 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.

## **12. 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:

- a) can continue to remain hosted on the Company's website for a longer period of time on the advice of concerned functional head.
- b) can be removed from the website or
- c) can be archived.

## **13. AMENDMENTS TO THE POLICY**

The Board of Directors may review or amend this policy, in whole or in part, from time to time as per the requirement of the Act or any other statute.

## **14. GENERAL**

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any

laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time. In the event of any conflict between the provisions of this Policy and of the Act or SEBI Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Agreement or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.

**References:**

1. Regulation 9 and 51(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
2. Section 2(f), 2(i) and 4 of Right to Information Act, 2005.
3. Clause (t) of sub-section (1) of Section 2 of Information technology Act, 2000.
4. Public Records Act, 1993 & Public Record Rules, 1997.
5. Section 2(36), 7(4), 85, 94, 120, 128(5), 186(9), 187(3), 189(2) of Companies Act, 2013 read with their relevant rules.
6. Companies Rules like;
  - (i) Companies (Preservation and Disposal of Records) Rules, 1966.
  - (ii) Rule 27 of the Companies (Management and Administration) Rules, 2014.
  - (iii) Rule 6(3), 7(3) of the Companies (Share Capital and Debentures) Rules, 2014.
  - (iv) Rule 10 (4) of the Companies (Registration of Charges) Rules, 2014.
  - (v) Rule 15 (1),15(2),15(3), 15(4), 25(1) (e), 25(1) (f), 27 & 28 of the Companies (Management and Administration) Rules, 2014.
  - (vi) Rule 12(1), 12(3),14(1), 14(3),16(1) &16(3) of the Companies (Meetings of Board and its Powers) Rules, 2014.
7. Secretarial Standard 1 & 2 issued by Institute of Company Secretaries of India (ICSI).

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