



**OPTIEMUS INFRACOM LIMITED**

**POLICY ON PRESERVATION OF DOCUMENTS**  
**& ARCHIVAL OF DOCUMENTS**

*Pursuant to Regulation 9 & 30 (8) of SEBI [Listing Obligations & Disclosure Requirements Regulations] 2015*

## PREAMBLE

The Securities and Exchange Board of India vide its Notification dated September 02, 2015 has issued the SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015. These Regulations mandates listed entities to formulate a policy on preservation of documents and an archival policy. It is in this context that the Policy on preservation of documents and an archival policy is being framed and implemented.

The Policy as approved by the Board shall be effective from April 1, 2016.

## OBJECTIVE

A policy on preservation of documents would ensure safe-keeping of the records and safeguard the documents from getting manhandled. This policy deals with the retention of the corporate records of Optiemus Infracom Limited (hereafter, the "Company").

### I. ARCHIVAL POLICY

Archival Policy is made to comply with the requirement of Regulation 30(8) as mentioned below:

*"The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation , and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website"*

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under the aforesaid regulation will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years.

### II. POLICY FOR PRESERVATION OF DOCUMENTS

#### A. PRESERVATION OF DOCUMENTS

As per the Policy, the Company shall maintain and preserve register and records, books and/or paper, books of accounts etc ("Documents") as follows:

- a) Documents to be preserved permanently;
  - b) Documents to be preserved for eight years; and
  - c) Documents to be preserved for two years.
- a. **Documents to be preserved permanently:** As required under the provisions of the Act / Rules / Regulations, the documents which are required to be preserved on permanent basis shall be maintained and preserved by the Company permanently.

- b. Documents to be preserved for eight years : As required under the provisions of the Act / Rules / Regulations, the documents which are required to be preserved for a period of eight years shall be maintained and preserved by the Company accordingly.
- c. Documents to be preserved for two years : In cases of documents for which no period is specified under the Act / Rules / Regulations, such documents shall be maintained by the Company for a period of two financial years from the close of relevant financial year.

## **B. MAINTAINANCE OF DOCUMENTS**

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

## **C. MODE OF PRESERVATION**

The Documents may be preserved in Physical Form, or Electronic Form as may be decided by the Departmental heads.

## **D. MODE OF PRESERVATION**

The preservation location shall be that of the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in secure cabinets. Those documents which are required to be kept at registered office of the Company by virtue of any law/rules/regulations, such documents shall be maintained at the registered office accordingly.

## **E. DISPOSAL OF DOCUMENTS**

The Documents that are no longer required as per the time schedule prescribed in Para II (A) may be destroyed. The Responsible Officers may direct the relevant employees from time to time to destroy the Documents which are no longer required as per the Preservation Policy.

## **F. DISCLOSURE/AMENDMENT**

The policy should be reviewed periodically by the senior Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The senior management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.