

WORLDWIDE LEATHER EXPORTS LTD.

CIN : L70109WB1990PLC049313

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The purpose of this document is to define the policy of the company regarding the preservation of documents. This policy is intended to ensure that all documents are preserved in a secure and accessible manner for the long term.

The scope of this policy applies to all documents created, received, or stored by the company, including but not limited to contracts, correspondence, financial records, and legal documents. It covers the entire lifecycle of the document, from creation to archiving and retrieval.

The policy is subject to periodic review and updates to reflect changes in technology and business requirements.

1. SCOPE

This policy applies to all documents created, received, or stored by the company, including but not limited to contracts, correspondence, financial records, and legal documents.

WORLDWIDE LEATHER EXPORTS LTD. POLICY ON PRESERVATION OF DOCUMENTS

- All documents created, received, or stored by the company shall be preserved in accordance with this policy.
- The company shall ensure that all documents are stored in a secure and accessible manner for the long term.
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2. DEFINITIONS

"Document" means any information recorded or stored in any form or by any means, including electronic, magnetic, optical, or physical, that is created, received, or stored by the company. This includes but is not limited to contracts, correspondence, financial records, and legal documents.

"Preservation" means the process of ensuring that documents are stored in a secure and accessible manner for the long term. This includes the use of appropriate storage media, backup procedures, and disaster recovery plans.

"Access" means the ability to retrieve and use documents in a secure and accessible manner. This includes the use of appropriate access controls and authentication procedures.



1. PREAMBLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), the Board of Directors (the “**Board**”) of **Worldwide Leather Exports Ltd.** has adopted this Policy at its meeting held on October 29, 2015, for Preservation of Documents, as required under applicable regulations.

This Policy is effective from **December 01, 2015**.

2. SCOPE

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVE OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same

The major objectives of the policy are:

- To identify statutory records to be preserved.
- To identify records to be maintained either for a period of eight years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form.
- To decide the procedure to destroy the documents after eight years or other applicable period,
- To help employees understanding their obligations in retaining and preserving the documents and records.

4. DEFINITIONS:

“**Act**” means the Companies Act, 2013, Rules framed there under and any amendments thereto.

“**Board of Directors**” or “**Board**” means the collective body of the Directors of the Company.

“**Company**”, “**This Company**”, “**The Company**”, wherever occur in the policy shall mean “Worldwide Leather Exports Ltd”.

“**Current**” means running matter or whatever is at present in course of passage.

“**Electronic Form**” means 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.

“**Maintenance**” means keeping documents, either physically or in electronic form.

“Policy” or “This Policy” means, “Policy on Preservation of Documents”.

“Preservation” means to keep the documents preventing them from being altered, damaged or destroyed.

“Register” means a register maintained under the Companies Act, 2013 or the SEBI Act.

“Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

5. INTERPRETATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. GUIDELINES

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

- (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 transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that need to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure – A**.

7. MODES OF PRESERVATION

The Documents may be preserved in

- a. Physical form; or
- b. Electronic Form.

The official of the Company who is required to preserve the document shall be Authorized Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the

documents.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

- Destruction of documents:

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under **Annexure A**. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at **Annexure B**. The entries in the register shall be authenticated by the Authorised Person.

8. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

9. AMENDMENT

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations

A. Gupta


ANNEXURE-A**A. Secretarial Records**

S.No	Record Type	Preservation period
Documents to be retained permanently		
1	Certificate of incorporation	Permanent
2	Certificate for commencement of business	Permanent
3	Memorandum and Articles of Association	Permanent
4	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013	Permanent
5	Register and Index of Members or other security holders, if any	Permanent
6	Register of Contracts as per Companies Act, 2013	Permanent
7	Register of Charges as per Companies Act, 2013	Permanent
8	Register of Investments as per Companies Act, 2013	Permanent
9	Policies of the Company framed under various regulations	Permanent
1	MCA Forms	Permanent
11	Agreements made by the Company with Stock Exchanges, Depositories, etc.	Permanent
12	Such other records as may be required under any law from time to time	Permanent
Documents to be retained for a minimum period of 8 years		
1	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013,	8 Years
2	Copies of all Annual Returns prepared under section 92 and copies of all certificates required to be annexed there to,	8 Years
3	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto,	8 Years
4	Scrutinizers' Report,	8 Years
5	Attendance Register of Board Meetings and General Meeting	8 Years
6	Office copies of Notice of General Meeting and related papers,	8 Years

7	Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,	8 Years
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B.Accounts and Finance

S.No	Record Type	Preservation period
1	Annual Audit Reports and Financial Statements	Permanent
2	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013,	8 Years
3	Bank Statemnts	2 Years
4	Investments Records	Permanent
5	General correspondence	1 Year

C.Tax Records

S.No	Record Type	Preservation period
1	Excise Records:	
	a)Excise Gate Pass b)ARE-1 c)Excise Return d)Proof of Export	8 Years
	e)Registration Certificate f)Surrender Certificate g)No dues Certificate	Permanent
2	TDS Records	
	a)Entry Register b)Monthly TDS Deposit Slip c)Quaterly Return d)TDS Certificate (26Q & 24Q)	8 Years
3	Income Tax papers	Permanent
4	Service Tax papers	Permanent

D. Legal files and Records		
S.No	Record Type	Preservation period
1	Court Orders	Permanent
2	Contracts, Arrangements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 Years
3	Litigation files	Permanent

E. Property Records		
S.No	Record Type	Preservation period
1	Original Purchase and Sale Agreement	Permanent
2	Property Insurance	Year to Year

F. Insurance Records		
S.No	Record Type	Preservation period
1	Insurance Policies	Year to Year
2	Inspection Reports	Permanent
3	Claims records	Permanent

G. Personnel Records		
S.No	Record Type	Preservation period
1	Payroll Registers	3 Years
2	Bonus, Gratuity and other Statutory Records	3 Years
3	Attendance Register and Leave Register	1 Years
4	Unclaimed Wages Records	3 Years
5	Employees Information Records - Personal Files	3 years after service end

H. Electronic Records

S.No	Record Type	Preservation period
1	Web page files	5 Years + 3 Years
	<ul style="list-style-type: none">• To be retained for a period of 5 years as specified in the Listing Regulations.• To be archived by the I.T. Department with the support of the service provider for a period of 3 years after the initial period of five years of live page.	