



(CIN : L65990MH1985PLC038164)

Regd. Off: Empire House, 214, Dr. D. N. Road, Ent. A.K. Nayak Marg, Fort, Mumbai - 400 001.

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Policy name	Corporate Records and Archives Policy
Approval Authority	Board of Directors

1. Purpose

The purpose of this policy is to establish the framework needed for effective records management. Such a policy is also mandatory as per SEBI (Listing and Disclosure Requirements) Regulations, 2015. This policy provides guidelines to employees on the creation and use of Company records, and sets standards for classifying, managing storing and retrieval of those records. It therefore provides a framework for the management of information consistent with the Strategic Plan. Basically the purpose is

- ✓ to ensure the records required to reconstruct activities or transactions that have taken place are present;
- ✓ to ensure records can be located and are accessible and available for decision-making;
- ✓ to o preserve context (who created the record, during what business process and how the record is related to other records);
- ✓ to preserve reliability of the record in a manner through which its integrity and authenticity can be demonstrated;
- ✓ to protect records from unauthorized loss and/or release and dispose of;
- ✓ to promote efficiency and economy in the creation, maintenance, storage, retrieval, and disposal of Company records;
- ✓ to ensure the preservation of those records of the Company that have permanent value so that they continue to be accessible and trusted despite changes of format or access applications;



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The Company has a substantial volume of records relating to its business activities. In order to efficiently conduct its business, the storage, retrieval and management of these information reserves is a significant issue.

A good record keeping program is fundamental to the Company's commitment to administrative transparency and accountability. It enables the company to account for decisions and actions by providing essential evidence in the form of records and ensures the preservation of the collective memory of the Company.

The Company is concerned with all aspects of its record keeping independent of the technological medium. This policy seeks to ensure that the Company's business is adequately documented through the creation of records that are then managed in accordance with best practice.

2. Definitions

Appraisal: the process of evaluating business activities to determine which records need to be captured and how long the records need to be kept, to meet business needs, the requirements of Company's accountability and regulatory expectations.

Archive: the whole body of records of continuing value of an organization or individual. Sometimes called 'corporate memory'.

Disposal: a range of processes associated with implementing appraisal decisions. These include the retention, deletion or destruction of records in or from record keeping systems. They may also include the migration or transmission of records between record keeping systems, and the transfer of custody or ownership of records.

Electronic records: records communicated and maintained by means of electronic equipment. Also as per definition in section 2(1)(t) of Information Technology Act, 2000.



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Evidence: information that tends to prove a fact. Not limited to the legal sense of the term.

Information systems: organized collections of hardware, software, supplies, policies, procedures and people, which store, process and provide access to information.

Record keeping: making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

Record keeping systems: information systems which capture, maintain and provide access to records over time.

Records: records information in any form including data in computer systems, created or retrieved and maintained by an organization or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

3. Scope

This policy is applicable to all areas and locations of the Company. It is intended to comply with relevant legislation in all states and territories in which Company has a presence.

Employees should be aware that electronic documents have the same status as paper documents. Both electronic and paper documents are bound by the same legislative requirements and are subject to the same degree of confidentiality and care. Therefore electronic records must be managed as part of a comprehensive record keeping program [see **Appendix B** – Electronic Records].

4. Legislative Framework

4.1 The Company has to comply with plethora of Central and State legislation and rules thereof and also Regulations, Rules, Guidelines laid down by the relevant Regulatory authorities – An illustrative list includes

...4



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- ❖ Companies Act - 2013 (Earlier Companies Act,1956)
- ❖ Foreign exchange Management Act -1999
- ❖ Income Tax Act - 1961
- ❖ Listing Agreement / Regulations
- ❖ Shops and Establishment Act
- ❖ Finance Act - 1994 – Service Tax
- ❖ State Value Added Acts
- ❖ Labour Legislations like Payment of Wages Act - 936, Minimum Wages Act - 1948, Employees State Insurance Act, 1948 Payment of Bonus Act -1965, Payment of Gratuity Act-1972

Each of the legislation stipulate different time frame for which the records are to be maintained. Companies Act calls for maintenance for 8 years, Income tax Act for 7 financial Years, Certain Labour legislations call for keeping registers for two years from last date of entry etc.

4.2 Permanent Records

Certain applicable legislations call for retaining records permanently and this include Minutes of Board Meetings, Annual General other Statutory Meetings, Annual Returns etc. These records to be safely stored and never destroyed.

4.3 Records part of pending Assessments, Appeals, Litigation, Investigation etc

Certain records may be part of pending tax assessments or appeals or litigation or investigation and storage and disposal of these records call for special care and its disposal to be mandatorily approved by the Chief Financial Officer or the Company secretary and Compliance Officer or Head Legal.



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5. Roles and Responsibilities of Record Keeping

5.1 Managing Director

Overall responsibility for records management rests with the Managing Director. As Chief Executive Officer he has ultimate responsibility to ensure that this Policy is implemented.

5.2 Managers at various levels irrespective of their designations whether Head of Function, Vice President, General Manager, Assistant General Manager, Manager, etc

Management-level staff are responsible for implementing and maintaining sound record keeping practices within their respective administrative units.

Managers must ensure that records are created, maintained and stored in accordance with the standards outlined in this policy, and that no records are destroyed except as authorised by the Retention and Disposal Schedule or Normal Administrative Practice. (see **Appendix A** – Normal Administrative Practice).

5.3 Staff

Record keeping is not the province of archivists, records managers or systems administrators alone, but is an essential role of all employees. Every member of staff is responsible for making and keeping such records as may be necessary to fully and accurately record the functions, activities, transactions, operations, policies, decisions, procedures, affairs, administration and management of the Company.

Staff members are to follow authorized procedures in carrying out records management functions, and must observe security, privacy and confidentiality requirements at all times, in accordance with the Company's Policies.

Staff members are to handle records sensibly and with care and respect so as to avoid damage to the records and prolong their life-span. ...6



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6. Creation of Records

In accordance with section 5.3 of this policy, all staff are required to create full and accurate records which adequately document the business activities in which they take part.

Records should be full and accurate to the extent necessary to:

- ❖ facilitate action by employees, at any level, and by their successors;
- ❖ make possible a proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- ❖ protect the financial, legal and other rights of the organization, the management and any other people affected by its actions and decisions.

7. Control of Records

7.1 Version control

Earlier versions (i.e. drafts) of a document may be deleted once the previous versions are no longer needed to create future records. However, drafts that must not be disposed of are those that document significant decisions, reasons and actions and contain significant information that is not contained in the final form of the record. This applies to both paper and electronic drafts.

7.2 Security

Records must be made accessible to authorized users. Officers of the Company in their normal course of their duties must have access to relevant records of the Company.

Personal information about staff and Customers of the Company must be secured within all levels of Company records. ...7



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7.3 Storage

Records should be stored in conditions that are clean and secure, with low risk of damage from fire, water, dampness, mould, insects and rodents.

They should also be kept away from direct sunlight and other sources of light and heat. The storage area should be well ventilated and ideally maintained at a stable temperature and humidity. Records in non-paper formats such as photographs, maps or computer storage media require specialized storage conditions and handling process that take account of their specific physical and chemical properties. Irrespective of format, records of continuing value require higher quality storage and handling to preserve them for as long as that value exists or is mandatory.

7.4 Technology

As storage of high volumes of records for long period of years call for huge storage space in different parts of the Country, it shall the endeavour of the top management to continuously review the storage methods and as far as possible and feasible to adopt modern technologies of storing records in electronic form say micro film, microfiche, or similar media etc. However it should be ensured that the records are properly indexed so that retrieval is feasible at minimum coast and time.

7.5 E-Mail

E-mail systems facilitate both internal and external business communications on a day-to-day basis. Messages contained on email systems are kept for a limited period of time. E-mail systems therefore should not be considered, or used as, an information archival or storage system. As stated above, e-mail messages that meet the criteria of a Record defined herein should be preserved in hard copy or stored electronically separately from email systems for record retention and archival purposes. ...8



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7.6 Retrieval

Proper and decipherable name to be given to the files. It is preferable to maintain an index of files with the head of the department or function and same is updated annually. A record of files – by individual name or group like Journal vouchers from ___ to ___ for Months ___ etc in the department to be maintained . A movement register of files is advisable if files may have to move from one department to another.

A record to be kept of records and files moved to godown or archives and also reference of location in the storage premises, cupboard or shelf number where such records are maintained also to be recorded.

An indexed record of files or records destroyed also to be kept so that search, if any in future if warranted is obviated.

8. Disposal and Destruction of Records

Staff may only destroy or dispose of records in accordance with the Company's Retention and Disposal Schedule or in accordance with Normal Administrative Practice [see **Appendix A** – Normal Administrative Practice].

The Retention and Disposal Schedule provides a listing of routine administration, personnel, accounting, and property records across the Company. It complies with legislation in each state or territory in which the Company has a presence and should be accepted as the minimum retention period for records.

Where records are scheduled for destruction this should be undertaken by methods appropriate to the confidentiality status of the records. All Company records approved and eligible for destruction must be destroyed under confidential conditions, unless the material is widely published. If staff are uncertain of the status of a record, it should be treated it as confidential and destroyed under confidential conditions.



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Refer **Appendix C** for illustrative list of records classifying as permanent and Temporary for the purpose of preservation or disposal after relevant period.

The name of records disposed to be recorded in a permanent register as per format in **Appendix D**.

Confidential records should be destroyed as follows:

8.1 Destruction of paper records

Paper records must be torn to pieces so that no paper could be reconstructed and preferably shredded using shredding machine and the scrap disposed off.

8.2 Destruction of magnetic media

Records stored on computer storage media must be destroyed by reformatting at least once. Deleting files from magnetic media is not sufficient to ensure the destruction of the records. Backup copies of the records must also be destroyed.

8.3 Destruction of optical media

Records held on optical media such as rewritable disks must be destroyed by cutting, crushing or other physical means.

9. Audit and Review

All record systems may be subject to audit and review to ensure compliance with legislative requirements and with the requirement of this policy.

To accommodate changes in legislation, technologies, programs and resources available to the Company this policy is to be reviewed on need based basis.



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10. Contact Personnel

In the event of any doubt on the implementation of this policy document or requiring clarity on whether certain records to be maintained or not or to be maintained for what period etc, the Chief Financial Officer or the Company secretary and Compliance Officer to be contacted.

11. Appendix A

Normal Administrative Practice

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both paper and electronic records.

The following categories of records may be destroyed as normal administrative practice:

- superseded manuals or instructions;
- catalogues and trade journals;
- copies of press cuttings, press statements or publicity material;
- anonymous letters;
- requests for copies of plans, charts, advertising material or other stock information;
- address lists and change of address notices;
- calendars, office diaries and appointment books (other than those for senior management as covered in the Retention and Disposal Schedule);
- facsimiles where a photocopy has been made;



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- telephone message;
- drafts of reports, correspondence, speeches, notes, spreadsheets, etc. and
- routine statistical and progress reports , MIS duplicate copies compiled and duplicated in other reports.

12. Appendix B

Electronic Records

Electronic documents have the same status as paper documents. Both electronic and paper documents are bound by the same legislative requirements and are subject to the same degree of confidentiality and care. Therefore electronic records are to be managed as an integral and routine part of record keeping.

12.1 Storage

Electronic records that contain evidence of official transactions should be backed up and migrated to new systems or transferred to off-line storage such as CD-ROM for longer-term retention and preferably a copy to be stored in different location for additional security. Strategies should be developed to ensure that these records remain accessible and useable in all future generations of software, for the entire period of their retention.

Records stored on Computer storage media must be destroyed by reformatting at least once. Deleting files from magnetic media is not sufficient to ensure the destruction of the records. Backup copies of the records must also be destroyed.

Records held on optical media, such as rewritable disks, must be destroyed by cutting, crushing or other physical means.



13. Appendix C

Illustrative List of Records categorizing permanent or otherwise for preservation or disposal after relevant period

Permanent Records	Temporary Records
<ul style="list-style-type: none">❖ The memorandum and articles of the company Affidavit from the subscribers to the memorandum and from persons named as the first directors❖ Register of members❖ Books and Documents relating to the issue of share certificates, including the blank forms of share certificates❖ Annual return❖ The foreign register of members❖ Minutes book of general meeting❖ Minutes of Board meeting❖ PAN / TAC Cards❖ Licences under various statutes or regulations.❖ Purchase / Sale deeds of immovable properties .	<ul style="list-style-type: none">➤ Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)➤ Copies of all annual returns prepared under the Companies Act, and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)➤ Registers under Companies Act.➤ All notices pertaining to disclosure of interest of directors➤ All certificates surrendered to a company (3 years from date of surrender)➤ Register of deposits (not less than 8 years from the date of last entry)➤ Instrument creating a charge or modification (8 years from date of satisfaction of charge)➤ Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later➤ Books of Accounts (8 years)➤ Completed Income Tax Assessment Files or Completion of time for assessment (6 assessment years)➤ Completed VAT / ST Returns. Documents (8 years)➤ Any other document (as per relevant applicable statute).



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14. Appendix D

The format of the register of Documents disposed/destroyed

PARTICULARS OF DOCUMENT S	DATE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON