

INTERNATIONAL COMBUSTION (INDIA) LIMITED
POLICY ON PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of the Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and adopted by the Board of Directors of the Company at its meeting held on 1st February, 2016]

1. PREAMBLE

This Policy for preservation of documents (hereinafter referred to as 'the Documents Policy' or 'this/ the Policy') has been framed in terms of Regulation 9 of the Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, (hereinafter referred to as 'the SEBI Regulations, 2015'). This Policy applies in respect of retention and preservation of documents and records relating to the Company or of any subsidiaries that it may have in future.

Documents and records of the Company may be either paper records or electronic records maintained in compliance with the provisions of the Information Technology Act, 2000.

Under various statutes, the Company is required to maintain certain types of records and documents for a specific period of time, default in which could mean serious legal consequences for the Company and its employees.

All employees of the Company are expected to fully comply with this Policy. Failure to comply with this Policy may result in disciplinary action against the employee, including suspension or termination.

This policy shall be governed by the provisions of the Companies Act, 2013, Income Tax Act, 1961, Information Technology Act, 2000, SEBI Regulations and all other applicable laws for the time being in force including rules and regulations made there under.

2. OBJECTIVE

Various documents are required to be mandatorily maintained & preserved for a stipulated minimum period of time under the various laws. This policy inter alia provides for preservation of documents in accordance with such laws as well as for the preservation and retention of documents for such period, in such form and in such manner as may be necessary for the proper conduct of the Company's business. This policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records.

3. DEFINITIONS

In this Policy,

- a) Applicable Law: "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) Document(s): "Document(s)" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, memoranda, declarations, forms, correspondence, minutes, indices, registers, e-mails, time sheets, contracts 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.
- c) Electronic Form: "Electronic Form" 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 or access to it, subject, however, to full compliance, wherever necessary, with the provisions of the Information Technology Act, 2000.
- d) Preservation: "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.

4. PRESERVATION OF DOCUMENTS / RECORDS

- a) All statutory records required to be maintained under any law shall be preserved for the period, if any, prescribed thereunder. For example, the Register of Members, the minute books of the meetings of the Board of Directors, Board committees and shareholders shall be maintained permanently. The books of accounts including vouchers, etc. pertaining to a minimum period of 8 financial years preceding the current financial year, shall be maintained in good order.
- b) If any direction has been received from any authority for maintenance of certain records for specified period, those records shall be maintained for the period specified.
- c) Documents, in respect of which no minimum maintenance timeline is stipulated under any of the laws or by any authority, shall be preserved for such period as may be decided by the concerned head of Department in consultation with the Company Secretary. If an employee believes or the Company requires that any records are relevant to litigation or potential litigation, then these records need to be preserved until the Company Secretary advises otherwise.

5. CUSTODY OF DOCUMENTS

All documents shall be under the custody of concerned functional head(s).

6. DESTRUCTION OF DOCUMENTS

After 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.

7. BUSINESS CONTINUITY PLAN

The Company maintains a Business Continuity Plan (BCP) designed to ensure safety of staff as well as members of the general public, safeguard the documents and records and to enable a return to normal operations with minimal disruption in case of any natural calamity or disaster or emergency. Detailed procedures for responding to such an incident or situation are part of the BCP.

In the event of any major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Company has made appropriate provision for the backup of its digital records, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability. The Company's BCP ensures that the digital records and technical infrastructure required to manage and access them can be restored in the event of an emergency.

8. COMPANY WEBSITE DISCLOSURES ARCHIVAL POLICY

All information posted on the Company's website, including information posted in terms of this Policy and in terms of Regulation 30 of the Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, shall remain posted on the website for a minimum period of five years from the date the said information is posted in accordance with the archival policy of the Company. 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 in consultation with the Company Secretary, wherever necessary
- b) can be removed from the website or
- c) can be archived.

9. REVIEW OF THE POLICY

This Policy shall be reviewed by the Board of Directors as and when deemed necessary.