

## **Policy on Preservation of Documents**

This is VEEDOL CORPORATION LIMITED's [formerly Tide Water Oil Company (I) Limited] (hereinafter referred to as 'the Company') policy for preservation of documents, in hard and electronic media. The Company reserves the right to revise this Policy at any time. This policy will come into effect from 2<sup>nd</sup> November, 2015.

### **Administrator**

All the Key Managerial Personnels shall be deemed to be the Administrator in charge of this Policy. His/her responsibilities are supervising the retention and destruction of documents according to the Document Preservation Schedule (below), and recording the actions taken to retain and/or destroy them.

The Board may modify and review the Document Preservation Schedule to comply with law and organizational policies.

### **Other responsible parties**

THE COMPANY's advisors and consultants are also subject to this policy. These responsible parties may have access to any document (whether containing confidential information or otherwise) for official purposes only with consent of the Administrator or concerned department-in-charge. When a responsible party leaves the Company, he/she is expected return all such documents.

### **Electronic documents**

The Administrator on direction by Board, from time to time will establish standards for document integrity, including guidelines for handling electronic files, backups, archiving documents, and checking the reliability of the system.

Electronic Documents may be stored under digital signature of the concerned department in charge.

### **Emergency planning**

Documents shall be stored in a safe and accessible place, and essential documents should be regularly duplicated or backed up. The Administrator should develop reasonable procedures for document retention in the case of an emergency.

### **Privacy**

The Administrator will determine how privacy of the Company's documents will be maintained and ensure compliance with laws, promulgated in this regard.

### **Suspension of document destruction**

The Company has a duty to preserve documents when litigation, an audit or a government investigation is anticipated.

Criminal liability may be statutorily imposed upon whomever "knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record or document with the intent to impede, obstruct, or influence the investigation or proper administration of any matter under any statute.

Thus, if Administrator/Board becomes aware that litigation, inspection or investigation has been instituted by any statutory authority, the Administrator on advice of the Board shall immediately suspend document destruction.

### **Register of documents destroyed to be maintained**

The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Company Secretary or such other persons as may be authorized by the Board for the purpose.

Document Preservation Schedule (for both hard and electronic copies)

Documents for permanent preservation

1. Register of members
2. Index of members
3. Minutes of the General Meetings
4. Minutes of the Board Meetings
5. Annual Reports of the Companies
6. Any other matter as the Board may determine from time to time

Documents for periodic preservation

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| 1. Register of debenture-holders   | 15 years after the redemption of debentures.                     |
| 2. Index of debenture-holders  | 15 years after the redemption of debentures.                     |
| 3. Copies of all annual returns prepared and copies of all certificates and documents required to be annexed thereto | 8 yrs from the date of filing                                    |
| 4. Signed Annual Accounts and all relevant vouchers and documents relating thereto                                   | 8 yrs from the date of closure of the financial year             |
| 5. Audited / Unaudited financial results and all other relevant documents  | 8 yrs from the date of closure of the relevant financial year    |
| 6. Legal documents, agreements, title deeds etc.   | 8 yrs from the date of expiry                                    |
| 7. Other documents, as specified by Board  | For such period as may be determined by Board from time to time. |

Note: Permanent Preservation denotes preservation of documents over the last forty years which are maintained in the Registered Office of the Company.