

FUTURE RETAIL LIMITED

CIN: L51909MH2007PLC268269

POLICY FOR PRESERVATION OF DOCUMENTS

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➤ **Legal Framework:**

In terms of the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), which comes into effect from 1st December, 2015, every listed entity shall have a policy for preservation of documents and other records of the Company, both in hard copy and electronic media (“Policy”). In terms of the aforesaid provisions, this Policy has been formulated by Future Retail Limited (the “Company”).

➤ **Purpose:**

The purpose of this Policy is to state the principles that guide the care and preservation of Documents and Records (defined hereunder) of the Company. It concerns Documents and Records in all formats including digital records. The preservation of Documents and Records is vital in order to ensure all current and future access to any information and ensuring authenticity of Documents and Records. The purpose of this Policy *inter-alia* includes (a) retention and maintenance of documents necessary for the proper functioning of the Company as well as to comply with applicable legal requirements (b) destruction of documents which are no longer required to be retained and (c) guidance for the officers and employees with respect to their responsibilities concerning document retention including the mode – physical, electronic, otherwise and destruction thereof. Notwithstanding the foregoing, the Company reserves the right to revise or revoke this Policy at any time.

For the purpose of this Policy, Documents and Records means and include any document or any recorded information in any format (including without limitation to paper, electronic and audio visual materials), wherever stored and which has been created by or for the Company in connection with the business activities of the Company.

➤ **Preservation and Maintenance of Records:**

The Company requires that its Documents and Records be maintained in a consistent and logical manner and be managed in such a manner that;

- i) the same adheres to the legal standards for protection, storage and retrieval;
- ii) protects the privacy of Documents and Records
- iii) Optimizes the use of space;
- iv) Minimizes the cost of record retention and
- v) Destroys outdated records in a timely and appropriate manner.

Each departmental head /Functional Head and/or such nominated representative of the Company must:

- i) Follow this Policy;
- ii) Develop department’s and/or office’s record management procedures and practices, consistent with this Policy;
- iii) Educate staff within the department in understanding sound record management practices;
- iv) Restrict access to confidential records and information and

v) Coordinate the destruction of certain records and destroy as provided in the applicable procedures.

➤ **Retention Schedule:**

The categories of documents including those which bear special consideration and identified so are mentioned in **Schedule I**. While minimum retention time are suggested, the retention of the documents identified in Schedule I and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors including but not limited to applicable laws, rules, regulations and guidelines.

➤ **Electronic Documents:**

Documents and Records in electronic format shall also be maintained as hard copy or paper documents, in accordance with the Schedule I hereto. Due to the fact that the integrity of electronic documents, whether with respect to the ease of alteration or deletion, or otherwise, may come into question, the Company shall at all times attempt to establish standards for document integrity, including guidelines for handling electronic files, backup procedures, archiving of documents, and regular checkups of the reliability of the system provided that such standards shall only be implemented to the extent that they are reasonably attainable considering the resources and other priorities of the Company.

➤ **Privacy:**

It shall be the responsibility of each departmental head /Functional Head and/or such nominated representative of the Company, to determine how privacy laws will apply to the Company's documents from and with respect to employees and other constituencies, to establish reasonable procedures for compliance with such privacy laws and to allow for their audit and review on a regular basis.

➤ **Emergency Planning:**

Documents and Records shall be stored in a safe and accessible manner. Documents and Records which are necessary for the continued operation of the organization in the case of an emergency shall be regularly duplicated or backed up and maintained at safe locations as identified by the Company. The head of Administration department shall develop reasonable procedures for retention of Documents and Records in case of an emergency.

➤ **Preservation of Records Relevant to Legal Matters:**

Any record that is relevant to any pending or anticipated litigation, claim, audit, agency charge, investigation or enforcement action shall be at least retained until final resolution of the matter has been arrived. In these circumstances, the Company will notify relevant departments and work with staff to identify and preserve any records (including electronic records) and other information that could be relevant to the ongoing litigation. Employees of the Company who become aware that an investigation or legal proceeding has commenced or is anticipated against the Company must notify the Head of the Legal Department so that all records with potential relevance to the investigation or legal proceeding can be preserved as necessary. This exception supersedes any previously or subsequently established destruction schedule for those records.

➤ **Disposal and Destruction of Documents and Records:**

In the event that it has been determined and in consistent with this Policy, it is appropriate to dispose of any Documents and Records, they can be destroyed in one of the following ways:

1. Recycle non-confidential paper records;
2. Shred or otherwise render unreadable confidential paper records; or
3. Erase or destroy electronically stored data.

For additional assistance, the concerned employees may contact the Head of Administration department of the Company.

The Head of Administration department of the Company will co-ordinate with the respective departments to understand document retention issues and to provide guidance on this Policy.

The above policy will be followed while maintaining the website of the Company.

SCHEDULE I
INDICATIVE LIST OF DOCUMENTS AND RECORDS AND RETENTION SCHEDULE

Record Category	Record Type	Maintenance Period to commence from
Documents whose preservation shall be permanent in nature	Register of loans, guarantee, security and acquisition made by the company	Since Inception
	Register of investments not held in its own name by the company	Since Inception
	Register of contracts with related party and contracts and Bodies etc. in which directors are interested	Since Inception
	Register of charges	Since Inception
	Register of Members including an index of the names	Since Inception
	Foreign register of members	Since Inception
	Minutes of Board or Committee Meetings and General Meetings	Since Inception
	Register of Renewed and Duplicate Share Certificates	Since Inception
Documents with preservation period is not less than eight years	Books of Accounts including vouchers relevant to any entry in such books of account	8 financial years preceding current financial year.
	Disclosures/ Notices by a director of his interest	For a period of eight years from the end of the financial year to which it relates
	The instrument creating a charge or modification	preserved for a period of eight years from the date of satisfaction of charge by the company
	Registers of deposits	for a period of not less than eight years from the financial year in which the latest entry is made in the register
	Register of debenture-holders including an index of the names	preserved for a period of eight years from the date of redemption of debentures or securities, as the case may be, and shall be kept in the custody of the company secretary of the company or any other person authorized by the Board for such purpose
	Annual return and copies of all certificates and documents required to be annexed thereto	preserved for a period of eight years from the date of filing with the Registrar
Documents for Special Consideration	Documents pertaining to respective functions such as labour, taxation, legal and litigations, licenses and approvals and other activities concerning the business of the Company.	Documents in relation to activities and those not included herein should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors including but not limited to applicable laws, rules, regulations and guidelines.
