

# Invigorated Business Consulting Limited

(Formerly Escorts Finance Limited)

## Policy for Preservation of Records

### Introduction

The following policy on preservation of records (“Policy”) of Invigorated Business Consulting Limited (“the Company”) has been reviewed and amended from time to time and last approved by the Board of Directors in its meeting held on October 26, 2023,

### Objective

This Policy is framed in accordance with the requirement of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “**SEBI Listing Regulations**”), and is intended to provide the systematic review, retention, and destruction of documents received or created in the course of business.

### Definitions

- a. “**Act**” means the Companies Act, 2013.
- b. “**Applicable Law**” means any law, rules, circulars, guidelines, or standards binding on the Company, under which the preservation of the Documents has been prescribed.
- c. “**Authorised Person**” means the functional head of the concerned department or any other person duly authorized by the Board or any of the Managing Director(s) of the Company.
- d. “**Board**” means the Board of Directors of the Company.
- e. “**Company**” means Invigorated Business Consulting Limited.
- f. “**Document(s)**” refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and/ or any other record/s maintained by the Company, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper/ print form or in Electronic Form and does not include multiple or identical copies.

- g. **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub-section (1) of Section 2 of the Information Technology Act, 2000.
- h. **“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.
- i. **“Preservation”** means to keep in good order and to prevent from being altered, damaged, or destroyed, other than as permitted by this Policy.

Any Capitalized term used herein but not defined shall have the meaning assigned to such term under the SEBI Listing Regulations or any other applicable law or regulation.

### Retention Period

Documents shall be retained in the following manner:

S. No.	Retention Period	Type of Record
1	Documents which are required to be preserved permanently	<ol style="list-style-type: none"> <li>1. Registration/ Incorporation Certificates, Licenses, and any other statutory approvals.</li> <li>2. Memorandum and Articles of Association of the Company.</li> <li>3. Minutes of Board Meetings, Committee Meetings and General meetings.</li> <li>4. All the Register as per the Act.</li> <li>5. Agreements with the Stock Exchanges, Depositories, and other Authorities.</li> <li>6. Investment documents of Subsidiaries and Associates.</li> <li>7. Orders issued by Courts and other Statutory Bodies.</li> <li>8. Documents pertaining to real estate, title documents.</li> <li>9. Any other documents as prescribed under the applicable law.</li> </ol>

2	Documents which are required to be preserved for a minimum period of 8 years	<ol style="list-style-type: none"> <li>1. Books of Accounts.</li> <li>2. Income Tax Returns and Tax Records.</li> <li>3. Agenda and other related papers shared with the Board of Directors for Board/ Committee or General meetings as required to be kept as per applicable law.</li> <li>4. Disclosure of Interest received from Directors and Senior Management.</li> <li>5. Annual Returns.</li> <li>6. Correspondence with shareholders and Statutory Bodies.</li> <li>7. Other material contracts and / arrangements.</li> <li>8. Any other documents as prescribed under the applicable law.</li> </ol>
3	For a maximum period of 3 years	<ol style="list-style-type: none"> <li>1. All emails having company's domain email id i.e. ibcl@ibcl.ltd</li> <li>2. Any other documents as prescribed under the applicable law.</li> </ol>
4	Any other Documents	As may be decided by the Authorised Person from time to time or as may be prescribed under any Applicable Law for the time being in force, whichever is more.

The Company shall maintain a Register of Disposal of Records in the custody of the compliance officer of the Company, wherein the brief particulars of the records disposed of shall be entered.

#### Procedures

1. Documents which have completed their retention period shall be disposed-off by the nominated authorities.
2. **Suspension of destruction** – If there is any actual or potential litigation or dispute or order by an administrative or judicial authority, the Documents relating to such litigation, dispute, or order ("**Suspended Documents**") shall not be destroyed. Such Suspended Documents shall be retained until released by the nominated authorities.
3. The nominated authorities shall maintain the following details in respective of destroyed Documents:

- a. Particulars of Document
- b. Date of Destruction
- c. Reason for Destruction
- d. Name of Owner of Document
- e. Name and Designation of authority approving destruction

### **Scope and Limitation**

In the event of any conflict between the provisions of this Policy and the SEBI Listing Regulations or any other statutory enactments, the statutory enactments shall prevail over this Policy.

### **Amendments and Updation**

The Board shall review periodically this Policy and shall also have the 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. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.

This Policy in whole or in part, shall stand modified/ amended from time to time, without any further act on the part of the Company, as and when there would be any statutory modification(s)/ amendment(s)/ revision(s) to the applicable provisions thereto.

**Invigorated Business Consulting Limited  
(Formerly Escorts Finance Limited)**

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