

Policy for Preservation of Documents

1. Introduction

The Board of Directors of Hexaware Technologies Limited (the “Company”) has adopted this policy for Preservation of documents in line with the provisions of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 (Effective from 1st December, 2015) (here in after referred as Listing Regulations). This Policy will be applicable to the Company with effect from 1st December, 2015.

2. Purpose

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires a listed entity to have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

- (a) documents whose preservation shall be permanent in nature;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

3. Documents

For the purpose of this policy, documents shall mean statutory records, registers, returns, forms etc. required to be maintained or preserved by the Company under the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996, the SEBI Act, 1992, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2018 and the provisions of the Companies Act, 1956 and Companies Act, 2013, as applicable, and the rules, regulations, circulars or guidelines made thereunder.

4. Documents Covered

A) Documents whose preservation shall be permanent in nature:

- a) Minutes of meetings of the Board of Directors and Committees of the Board
- b) Minutes of general meeting of shareholders
- c) Register of Members
- d) Memorandum and Articles of Association as amended from time to time.

e) Documents relating to incorporation

B) Documents with preservation period of not less than eight years after completion of the relevant transactions unless longer period is specified in any other statute.

a) A copy of all materials provided to the Board of Directors or Committees of the Board i.e. notice of meeting, agenda, notes on agenda shall be maintained for a period of eight (8) years.

b) Attendance registers of the meeting of Board of Directors

c) Books of accounts and vouchers should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used.

d) Scrutinizer's register, report and other related papers relating to e voting.

e) Annual returns

f) Instrument creating charge or modification of charge shall be kept for a period of 8 years after satisfaction of charge.

g) Records of the disclosures made pursuant to Insider Trading regulations for a period of 5 years.

C) The Statutory Registers, filings with Registrar of Companies and other documents as required under the Companies Act 2013 shall be retained as per the requirement of the Act.

D) Other Statutory records: The other statutory records as required under various statutes shall be retained as per the requirement under the relevant statute.

5. Obsolete Records

Documents, paperwork and other form of information that have aged / past the relevant retention period are Obsolete. The obsolete documents may be discarded within 30 days of the end of the retention period.

6. Disclosure

If required as per any applicable law or regulations this policy shall be uploaded on the website of the Company at www.hexaware.com

7. Policy Review and Amendment:

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit.

8. Precedence:

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, regulation or standard.
