

**THE RAMARAJU SURGICAL COTTON
MILLS LIMITED**

**POLICY ON COVERING THE MAINTENANCE OF BOOKS OF
ACCOUNTS, REGISTERS AND RETURNS IN ELECTRONIC
FORMAT**

POLICY ON MAINTENANCE OF BOOKS OF ACCOUNTS, REGISTERS AND RETURNS IN ELECTRONIC FORM

[Under Section 120 and 128(1) of Companies Act, 2013]

PREAMBLE

Records are the output of the business and administrative process of the Company. In other words, the official proof that business and administrative process as transacted. It serves as essential proof of the business that was conducted and should remain unaltered over a period of time as they are needed. As evidence of official business, records have ongoing use as a means of management accountability, operational continuity for legal evidence and disaster recovery.

The records management is a process of ensuring the proper creation, maintenance, use and disposal of records to achieve efficiency, transparency and accountable governance.

REGULATORY FRAME WORK

Section 120 of the Companies Act, 2013, provides maintenance of documents in electronic form or any such form as may be prescribed. Section 397 of the Companies Act, 2013 prescribes that any document reproducing or derived from returns and documents filed by the Company with Registrar of Companies on paper or in electronic form or stored on a electronic storage device or computer readable media by the Registrar of Companies and authenticated by Registrar of Companies or other officer empowered by the Central Government in such manner as may be prescribed shall be deemed to be a document for the purposes of the act and the rules made thereunder and shall be admissible in any proceedings thereunder without further proof of production of the original as evidence of any contents of the original or of any fact stated therein of which direct evidence is admissible.

Section 397, 398, 400, 401 and 402 of the Act empowers the Central Government to make rules so as to require from such date as may be prescribed in the rules that the filing of the documents as may be prescribed be done in the electronic form.

POLICY

The policy with regard to maintaining of records in electronic form is divided into two parts, namely,

1. Maintenance of Records
2. Security of Records

MAINTENANCE OF RECORDS IN ELECTRONIC FORM

The books of accounts and records shall be maintained in the form and in accordance with other requirements as provided in the respective statute or rules made thereunder.

The records shall be stored in readable, retrievable and reproducible in printed form.

The records capable of being dated and signed digitally wherever it is required under any statute or rules made under shall be maintained in the manner as prescribed.

Once such records were signed digitally, it shall not be capable of being edited or altered.

SECURITY OF ELECTRONIC RECORDS

The Company shall provide adequate protection against unauthorised access, alterations or tampering of such records.

The Company shall ensure against loss of records as a result of damage or failure of the media on which the records are maintained.

The Company shall ensure that signatory of electronic records does not repudiate the signed record as not genuine.

The Company shall ensure that computer systems software and hardware are adequately secured and validated to ensure their accuracy, reliability and consistent in intended performance.

The Company shall ensure that records are accurate, accessible and capable of being reproduced for reference later.

The Company shall ensure that records at all times are capable of being retrieved and in printable form.

The Company shall ensure that records are kept in non-rewritable, nonerasable form or any other form which cannot be altered or tampered.

The Company shall ensure that at least one back-up is taken at a periodicity of not exceeding one day, and all the updated records are kept in electronic form. Every back up shall be authenticated, dated and such back ups are securely kept at such places as may be decided.

The Company shall limit the access of the records to any officer of the Company or persons performing work of the Company as may be authorised.

The Company shall ensure that reproduction of non-electronic original records in electronic form is complete and true and legible when retrieved.

The Company shall arrange and index all the records in a way that permits easy location, access and retrieval of any particular record.

The Company shall take necessary steps to ensure security, integrity and confidentiality of records.

The Company shall ensure necessary personnel and provide necessary training to such personnel for maintenance of the Company's electronic records.

RESPONSIBILITY

The President / Head of Information Technology Department and such other Officer as may be authorised by the Company shall be responsible for security of electronic records. It shall be ensured that this policy is implemented in accordance with the provisions of Companies Act 2013 by:

1. Providing systems and skilled personnel to implement the policy.
2. Keep a record of Hardware, Software and other infrastructure provided for the purpose.
3. Training the personnel for safe and secured maintenance of records in electronic form
4. Conducting periodic inspection and review of such systems to ensure that they are effective.
5. Report any critical incidences involving data security such as data loss, hacking attacks, serious data errors etc to the board.
