

CENTENIAL SURGICAL SUTURE LTD.

Registered Office : F-29, MIDC, Murbad, Thane 421401. MAHARASHTRA.
CIN : L99999MH1995PLC089759 ::: Telephone : 02524-222905 :: Fax : 022 -2417 1261
email : shareinvestor@centenialindia.com ::: Website : www.centenialindia.com

Document Retention & Archival Policy As Adopted by the Board of Directors On Saturday, February 13, 2016

This policy deals with the retention and archival of the corporate records of Centenial Surgical Suture Ltd.

Corporate records are all paper or electronic records that are produced by you as an employee, including but not limited to, memoranda, contracts, e-mails, time sheets, effort estimates and expense records.

The Company is required to maintain certain types of corporate records for a specified period of time. Failure to do so could subject the Company and its employees to serious legal consequences.

All employees are expected to fully comply with this policy.

Generally, all corporate records (whether electronic or paper) of the Company are to be retained for no less than Three (03) years, and may be destroyed thereafter.

If an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise.

The policy should be reviewed periodically by the Senior Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The senior management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time

Additionally, there are certain types of records that need to be retained for a longer period of time, as identified below.

- a) **Board of Directors Records:** Minutes of meetings of the Board of Directors shall be maintained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for no less than Three (03) years.
- b) **Press Releases & Public Filings:** All press releases and publicly filed documents shall be maintained in perpetuity. All events and press releases filed with the stock exchanges shall be maintained for no less than Five (05) years on the website of the company.
- c) **Books of Accounts and Tax Records:** Books of accounts and Tax records should be retained for at least Eight (08) years following the completion of the relevant transactions or assessment year for which the records were last used.
- d) **Employment Records:** The Company maintains personnel records that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment, such as actions taken against personnel. These records should be retained for a period of Three (03) years following the cessation of employment.

- e) **Intellectual Property Records:** Documents relating to the development and protection of intellectual property rights should be maintained for the life of such intellectual property right.
- f) **Contracts:** Execution copies of all contracts entered into by the Company should be retained for at least Three (03) years following the expiry or termination of the contracts.
- g) **SEBI Regulations:** The Company shall maintain all records SEBI Regulations for not less than 08 (Eight) Years. Documents that are to be made available on the Company's website in Compliance with the SEBI (Listing Regulations and Disclosure Obligations), 2015 will be made available on the website for a period of 5 years and thereafter will be archived for a period of 3 years.

Record Maintenance and Storage

All records in physical form are to be maintained by the Records / Respective Department(s) at the respective locations.

Electronic version(s) of all of records are to be maintained within the Company's centralized electronic record software database, which is maintained by the IT Services Department.

Disposal of Records

Physical records disposed of pursuant to the retention periods specified in the Document Retention Schedule shall be disposed of using a cross-cut shredder. The Records Department shall adopt appropriate procedures to permanently dispose of any non-paper physical records, such as photographs or audio/video recordings.

In the event that it is necessary to manually dispose of an electronic record, the IT Department shall use the "permanent delete" function to permanently dispose of electronic records.

Hold on Record Destruction and Deletion

If a lawsuit or other proceeding involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, must cease immediately.

Documents relating to the lawsuit or potential legal issue will then be retained and organized under the supervision of the Group General Counsel's Office.

Violation of this aspect of the Company's Document Retention Policy could subject the Company and the employees involved to civil and criminal penalties.

In the event of a Document Hold Direction, the IT Department shall immediately disable the "permanent delete" and "automatic delete" functions of the Company's software with respect to the designated records and disable the automatic deletion of recycle bins and deleted items folders on appropriate Company computers; the Records Department shall immediately suspend all disposition of records maintained on-site or off-site location as appropriate; and the Group General Counsel's Office shall immediately notify all appropriate employees by e-mail that they are not to dispose of relevant Temporary Records or other records until notified otherwise.

Compliance

Failure to comply with this policy may result in disciplinary action against the employee, including suspension or termination.