

**ABS MARINE SERVICES LIMITED**

**Registered Office: Flat No:3, Anugraha Foundation,  
No: 15, Valliammal Road, Vepery, chennai, Tamil Nadu, India,  
600007**

**Tel: +91-44 42914141; Fax: 91-44-4291 4145**

**Website: [www.absmarine.com](http://www.absmarine.com)**

**CIN: U71120TN1992PLC023705**

**POLICY ON PRESERVATION**

*Table of Contents*

<b>1</b>	<b>Purpose and Scope</b>	3
<b>2</b>	<b>Statutory Mandate</b>	3
<b>3</b>	<b>Classification of Documents to be preserved / retained</b>	3
<b>4</b>	<b>Principle of Responsibility of Employees for Preservation of Documents</b>	4
<b>5</b>	<b>Periodical Review of the Policy by Top Management</b>	4
<b>6</b>	<b>Appendix</b>	5-10

**Policy on Preservation of Documents and archival of documents in its website****1. Purpose and Scope**

The purpose of this documents is to present a high level policy statement for ABS MARINE SERVICES LIMITED regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and in accordance with the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

The policy is intended to define ABS MARINE SERVICES LIMITED preservation of documents responsibilities and to provide guidance to the executives and staff working in ABS MARINE SERVICES LIMITED in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frame the guidelines for fundamental accountability ABS MARINE SERVICES LIMITED to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

This policy was approved by the Board of Directors on 13<sup>th</sup> December,2023.

**2. Statutory Mandate**

The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources.

**3. Classification of Documents to be preserved / retained**

Based on the recommendation of the management of the Company, the Board of Directors have classified the documents into various categories to be retained and preserved based on the legal requirements and characteristics of documents .

- A) Documents that need to be preserved / retained permanently – Doc-1
- B) Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR – Doc-2
- C) Documents to be preserved electronically and archived when necessary –Doc-3.

**4. Principle of Responsibility of Employees for Preservation of Documents**

All the Employees in the permanent rolls of the Company are responsible for preservation of documents and have to taken to account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness and will be a tool helping the Company's and Outside legal counsel to track down documents to handle the legal cases.

**5. Periodical Review of the Policy by Top Management**

The Policy is flexible and is easy to understand and has to be complied by all levels of employees. The policy will be reviewed periodically by the Top Management of the company and amendments will be effected to subject to approval of the Board if and when practical difficulties are encountered. The Top management may also review this policy on document retention considering compliance requirements under any local, state, central legislations that may be promulgated from time to time.

**6. Effective Date**

This Policy is effective from 13th December,2023.

**APPENDIX**

**Nature of Records of the company**

1. Accounting and Finance records including Annual Financial statements
2. Manning(Shipping) related Records
3. Safety Related Records for Vessels of Ships
4. Tax records
5. Secretarial Records including Certificate of Incorporation, Listing Agreement and other approvals/ correspondences with authorities relating to capital markets, Ministry of corporate Affairs .
6. Legal Files relating to litigations and Records relating to litigations
7. Property Records
8. Payroll Records
9. Personnel and Human Resource Records
10. Insurance Records
11. Correspondences with statutory authorities, third parties and correspondences within the organisation

## 1. Accounting and Finance records including Annual Financial statement

Record Type	Category of Document as referred in point no 3 of this policy	Retention Period
Accounts Payable ledgers and schedules	DOC-1	Permanent
Accounts Receivable ledgers and schedules	DOC-1	Permanent
Annual Audit Reports and Financial Statements	DOC-2	8 years
Annual Audit Records, including work papers and other documents that related to the audit	DOC-1	Permanent
Annual Plans and Budgets	DOC-2	8 years
Bank Statement and Cancelled Cheques	DOC-2	8 years
Employee Expense Reports	DOC-3	
General Ledger including Ledgers relating to Journals made by the company	DOC-2	8 years
Investment Records and related journals	DOC-2	8 years
Security deposit receipt copies	DOC-1	Permanent
Journal Vouchers , cash voucher ,bank voucher and vouchers of all types	DOC-3	

**Responsibility: FINANCE AND ACCOUNTS DEPARTMENT**

## 2. Manning(Shipping) related Records

Record Type	Document Type	Retention Period
STCW Certificate	DOC-3	3 Years
Certificate of Competency, (COC), Continuous Discharge Certificate (CDC) and Passport details	DOC-3	3 Years
Joining Documents, Application Forms, Declarations and Undertaking	DOC-3	3 Years

Other Documents	DOC-3	3 Years
-----------------	-------	---------

### Responsibility -- MANNING DEPARTMENT

#### 3. Safety Related Records for Vessels of Ships

Record Type	Document Type	Retention Period
Drills Exercise Report	DOC-3	
Safety Committee Meeting Papers (Monthly)	DOC-3	
Master SMS Review Papers	DOC-3	
ISO Audit Papers	DOC-1	Permanent
Other Documents	DOC-3	

### Responsibility – QUALITY AND SAFETY DEPARTMENT

#### 4. Tax records

Record Type	Document Type	Retention Period
Tax-Exemption Documents and related correspondence	DOC-1	Permanent
Excise Tax records	DOC-1	Permanent
Payroll Tax records	DOC-1	Permanent
Tax Bills, Receipts, Statements	DOC-1	Permanent
Tax Returns – Income, Franchise, Property	DOC-1	Permanent
Tax workpaper packages - Originals	DOC-1	Permanent
Sales Tax Records	DOC-1	Permanent
Annual Information Returns – State and Central	DOC-1	Permanent
Service Tax Records	DOC-1	Permanent

### Responsibility : FINANCE AND ACCOUNTS DEPARTMENT

#### 5. Secretarial Records including Certificate of Incorporation, Listing Agreement and other approvals/ correspondences with authorities relating to capital markets, Ministry of corporate Affairs.

Record Type	Document Type	Retention Period
Corporate Records (certificate of incorporation, commencement of business, common seal, minutes book of board, general meeting and committees thereof,	DOC-2	8 years

annual reports originals, statutory registers to be maintained under Companies Act)		
Licence and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	DOC-2	8 years
ROC Filings Exchange filings in physical and Electronic form	DOC-2	8 years
Correspondences with Authorities	DOC-3	
Disclosure of Interest received from directors	DOC-2	8 years
Declaration from Independent directors	DOC-3	
Correspondence with depositories	DOC-3	

**Responsibility -- SECRETARIAL DEPARTMENT**

**6. Legal Files relating to litigations and Records relating to litigations**

<b>Record Type</b>	<b>Document Type</b>	<b>Retention Period</b>
Legal Memoranda and Opinions	DOC-1	Permanent
Litigation files	DOC-1	Permanent
Court Orders	DOC-1	Permanent

**Responsibility : LEGAL AND SECRETARIAL DEPARTMENT**

**7. Property Records**

<b>Record Type</b>	<b>Document Type</b>	<b>Retention Period</b>
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	DOC-1	Permanent
Original Purchase / Sale Deeds	DOC-1	Permanent
Original Lease Agreements	DOC-1	Permanent

**Responsibility : LEGAL AND SECRETARIAL DEPARTMENT**



**8. Payroll Records**

Record Type	Document Type	Retention Period
Payroll Registers (Gross and Net)	DOC-3	
Leave Records	DOC-3	

**Responsibility -- HUMAN RESOURCES DEPARTMENT**

**9. Personnel and Human Resource related Records**

Record Type	Document Type	Retention Period
Personnel Files of individual employees	DOC-3	
Commission / Bonuses / Incentives / Awards	DOC-3	
Employee Earnings Records	DOC-3	
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers	DOC-3	
Employment Contracts - Individual	DOC-3	
Correspondence with Employment Agencies and Advertisements for job openings	DOC-3	
Job Description	DOC-3	

**Responsibility – FINANCE AND HUMAN RESOURCES DEPARTMENT**

**10. Insurance Records**

Record Type	Document Type	Retention Period
Claim Files (Including	DOC-3	

correspondence, medical records, injury documentation, etc.		
Group Insurance Plans – Active	DOC-3	
Employees	DOC-3	
Insurance Policies for the Company	DOC-3	
Journal Entry Support Data	DOC-3	
Insurance of Ships	DOC-3	

**Responsibility : HR AND FINANCE AND ACCOUNTS DEPARTMENT**

- 11.** Correspondences with statutory authorities other than those mentioned in this policy above, third parties and correspondences within the organisation.

General Principle : Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract.

- 1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years.
- 2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

**Responsibility -- RESPECTIVE DEPARTMENT**