



SHIPPING CORPORATION OF INDIA LAND AND ASSETS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

(“SCILAL DOCUMENTATION POLICY”)

(With immediate effect in terms of approval of Board of Directors on 06.05.2025)

TABLE OF CONTENTS

SR. NO.	PARTICULARS	PAGE NO.
1.0	INTRODUCTION	3
2.0	OBJECTIVE	3
3.0	SCOPE	3
4.0	DEFINITIONS	3
5.0	CREATION OF RECORDS	3
6.0	MAINTENANCE OF RECORDS	5
7.0	RECORD OFFICERS	6
8.0	RECORD RETENTION SCHEDULE	7
9.0	DESTRUCTION OF RECORDS	9
10.0	REPORT OF DESTRUCTION OF RECORDS	9
11.0	COMPLIANCE OF DOCUMENTATION POLICY	10
12.0	MODIFICATIONS AND AMENDMENTS TO THE POLICY	11
13.0	REVIEW OF DOCUMENTATION POLICY	11
14.0	LIMITATION	11
	SCHEDULE OF AMENDMENTS TO THE POLICY	11

1.0 INTRODUCTION

Documents are generated in the regular course of work. In SCILAL, various types of documents/records are / will be created to carry out the various functions. These records are to be closed after action on the issues considered thereon has been completed. While the files of purely routine/temporary nature, containing little reference or research value, need not be formally recorded and may be destroyed within short period, there will be different other categories of records which are required to be retained for different specific periods, according to their importance and reference value.

2.0 OBJECTIVE

The objective of this policy is to define the regulations to coordinate, regulate and supervise the operations connected with the administration, management, preservation, selection, disposal and retirement of records.

3.0 SCOPE

The scope of the Documentation Policy is as follows :

1. Creation of records
2. Maintenance of records
3. Retrieval of Records
4. Record Retention schedule
5. Destruction of records
6. Report of destruction of records

4.0 DEFINITIONS

4.1 **Record** includes -

- (i) any document, manuscript and file;
- (ii) any scanned, facsimile or digital copy of documents;
- (iii) any reproduction of image or images embodied in any form
- (iv) any other material produced by a computer or by any other device of any records creating agency;

4.2 Records **Creating Agency (RCA)** includes any department, division or office of SCILAL which creates a record to carry out its functioning.

4.3 Records **Officer**” means the officer nominated by the records creating agency

4.4 **Custody** means the possession of records:

4.5 **File** means a collection of papers relating to the records on a specific subject-matter consisting of correspondence, notes and appendix thereto and assigned with a file number.

4.6 **Retention Schedule of Records** means a Schedule which provides the period of retention of records.

4.7 **Review** means periodical evaluation of recorded files on the expiry of the period of retention

5.0 CREATION OF RECORDS

5.1 Categorization of documents

All documents at SCILAL will be classified in any one of the following three categories:

Category A

Records created under 'A' category are for permanent preservation and are to be digitalized and copies on Server and external disks because they contain precious documents. The originals must be preserved intact and access to it in the original form must be restricted to the barest minimum.

Files containing 'A' category record

1. 'A' category record like evidence of rights, title of properties, claims for compensation not subject to time limit, formal instruments such as awards, schemes, orders, important sanctions, board notes, board approvals, important policy circulars which are mandatory in nature, rules and regulations, procedures etc. shall be serially numbered and maintained in a separate index folder in each concerned department besides placing them in the relevant files.
2. 'A' category records are the documents containing evidence of rights or obligations of or against the government, title to properties, claims for compensation not subject to time limit, formal instruments such as awards, schemes, order, sanctions, Board notes, Board approval, etc.
3. Documents relating to all policy decisions, documents relating to incorporation of the company/ joint ventures, important government directives, title documents, functions working of important committees, working rules, bio-data of employees etc. in the organization. Documents providing lasting precedence of important procedures. E.g., administrative memoranda, historical reports and summaries, legal opinions on important matters. Documents concerning rules, regulations, department guidelines, instructions of general applications. Documents relating to important litigation or causes, celebres in which the administration was involved. Documents relating the implementation of change of policy. Document pertaining to financial data covering the long period. Papers relating to salient feature of organization and staffing of Divisions/ Departments. All Govt. of manuals like Personal Manual, Purchase Manual, ISM Manual etc.
4. Any other specific category of records deemed fit by the respective Divisions to Categories as "A category record.
5. Material likely to be required for frequent reference by different Divisions/ Departments.

Category B

Documents which pertain to an asset/employee/issue which have to be kept during the work life and for a specified period after the action on the issues considered thereon has been completed. The period will be determined by the RCA.

Preservation periods may be determined keeping in mind timeline specifications by statutory authorities under applicable laws and documents with preservation period specified under any other policy of the Company or duly approved by the Management / Functional / Strategic Business Unit Head / Entity Head as per the business needs of the Company or Delegation of Authorities.

'B' type record are documents containing property acquisition, personnel files, legal cases, title documents, intellectual property rights, important designs and drawings, long term bank guarantees, long term contract agreements etc.

Category C

Documents of routine nature which are meant to be maintained for a limited period not exceeding ten years. Records under this category pertain to subjects of secondary importance having referral value for a limited period.

The files in category C will be classified with the number of years specified for retention i.e. C-1, C-3, C-5 and C-10 etc. where the numerical represents the number of years that a file is to be retained after being closed or recorded.

Preservation periods may be determined keeping in mind timeline specifications by statutory authorities under applicable laws and documents with preservation period specified under any other policy of the Company or duly approved by the Management / Functional / Strategic Business Unit Head / Entity Head as per the business needs of the Company or Delegation of Authorities.

5.2 Numbering of records

While numbering such records following sequence may be followed:

Division/ Department /File Type/Year/ Document No. (eg. P&A/SP/CIR/2025/01).

The concerned division may consider short reference with alphanumerical pattern for identifying the document. File numbering may be given as per the convenience of the department from the point of view of easy retrieval. The year may be either the Financial or Calendar Year, based on departmental preference.

5.3. Initiation of records

1. All records irrespective of their category may be created initially by an officer of any rank.
2. Documents /records needing approval of C&MD may be initiated by a Departmental Head or an officer not less than Senior Manager rank.
3. Documents which need approval of the Management Committee/ Board may be initiated by the concerned Director / Head of Department and record of such documents are to be maintained in the Directorate of concerned Director / Office of the Head of the Department. Record Register will be created indicating the indexes, file number, custodian of file, location of file etc.

5.4 Pagination of Records

Pages in the sensitive or permanent records, as determined by the respective department are to be sequentially number beginning from the page at the bottom.

6.0 MAINTENANCE OF RECORDS

6.1 Maintenance of records

The records in the organization are required to be maintained for certain period of time safely, systematically in such a way that same can be made available for future reference. It should be maintained by each Division under the overall control of Record Officer. The record should have proper circulation of air in the storage area by providing sufficient number of fans and exhaust fans to counteract the effect of high humidity and prevent formation of pockets of stagnant air in the record room. P&A Division will make arrangements to fulfill the minimum requirement necessary for the Divisional record rooms. E.g. such as providing required number of fans, shelving, lighting arrangements, firefighting arrangements etc. The Company may keep documents/records in electronic mode.

6.2 Record Officers

The Management will nominate a Chief Record Officer at the Organization level.
Each Division / Region will nominate an officer as a Record Officer (RO).

Each department will nominate a Departmental Record Officer (DRO).

6.3 Record Register

The Record Register will contain a list of records. The custodian of the Record Register will be the Record Officer. Disposal of documents as per the retention schedule is to be mentioned for each document.

6.4 Retrieval of Records

The records available in department/ divisional record room may be made available to all concerned officers of departments for references. The departmental/ divisional record officer is responsible for maintenance of records and to issue the required documents / records to the concerned officers of departments for which he will maintain the record book indicating the detailed movements of record/ documents. It will be the responsibility of departmental/ divisional record officer to get the record back in record room within the permitted period.

The records/ documents kept in record room may be made available for references of officers of various departments / divisions only through the record officer / departmental record officer and he will make the records available to the concerned officer of a particular department based upon the requisition received by him.

To access the records, the prescribed format has been prepared along with acknowledgement with the following columns

1. Sr No
2. File no
3. File description
4. Person accessing the document
5. Date of withdrawal
6. Signature of Person accessing the document
7. Date of return
8. Signature of the receiver

The withdrawal register would be maintained in the record room indicating each withdrawal of documents.

6.5 Outsourcing of Services for Record Management

There may be some important records containing various data which may not be required very frequently that are required to be retained for longer period. Such records may be sent to the outsourced services facility with the approval of the Divisional head.

7.0 RECORD OFFICERS

7.1 Reporting Structure

The Chief Records Officer shall act under the Director (Operations) while discharging the responsibilities of CRO.

The records officer shall act under the Divisional Head while discharging the responsibilities as RO.

The department record officers shall act under their respective departmental heads while discharging the responsibilities of DRO.

7.2 Duties and Responsibilities

The CRO, RO and DRO will ensure the following at the organization, divisional and department level respectively:

- (a) Proper arrangement, maintenance and preservation of records under their charge
- (b) Periodical review of all records and weeding out records of routine nature
- (c) Destruction of public records in such manner and subject to such conditions as are prescribed in this policy
- (d) Compilation of a schedule of retention for records in consultation with the Division/ Department as applicable
- (e) Taking appropriate action in the event of unauthorized removal, destruction etc. of records in this respect.
- (f) Maintaining details of all the divisional records centrally. The DRO shall maintain details of all the departmental records.
- (g) Timely submission of all necessary reports as required to the Management.
- (h) Behave in a manner which is not detrimental to the maintenance and preservation of Company records.

7.3 Every records creating agency may set up such number of record rooms in such places as it deems fit and shall place each record room under the charge of a records officer.

7.4. Divisions/ Departments will provide suitable assistance to the RO/DRO as required for carrying out their duties and responsibilities.

8.0 RECORD RETENTION SCHEDULE

8.1 One of the prerequisites of a good Records Management is to ensure that records are neither prematurely destroyed nor kept for periods longer than required – at the cost of economy and efficiency. Thus, in order to prescribe judicious retention periods to different categories of records, a Records Retention Schedule (RRS) needs to be drawn up.

8.2 The Record Retention Schedule shall be a part of the documentation policy.

8.3 Types of Records Retention Schedules

Records Retention Schedules are of three types, viz.

1. Retention Schedule for Records pertaining to Facilitative Functions which are common to all departments
2. Retention Schedule for Records pertaining to Substantive Function include records pertaining to the functions which are specific to that particular Record Creating Agency.
3. Retention schedule for files put up on SCILAL website.

8.4 Records Retention Schedule for Records pertaining to Facilitative Functions:

Records pertaining to Facilitative Functions are common to all departments. These relate to:

- i. Establishment, Personnel, and Housekeeping matters, e.g. Establishment, Welfare, Vigilance, Common Office Services viz. accommodation, furniture, stationary and forms, office equipments, library, security etc., Hindi, Public Relations, Parliament etc.

- ii. Common Office Procedures, and include various Registers, Lists, Diaries, Reports etc
- iii. Financial matters, viz. Finance, Budget, Cash and Accounts etc.

Records Retention Schedules prescribed for the (i) above will be created by P&A Division, (ii) will be created by ISM Cell and Board Secretariat and for (iii) by the Finance Division.

8.5 Records Retention Schedule for Records pertaining to Substantive Functions

Records pertaining to Substantive Functions of a Records Creating Agency (RCA) include records pertaining to the functions which are peculiar (specific) to that particular agency.

The Retention Schedule for records pertaining to Substantive Functions of each RCA would be according to the records created by it.

Every RCA would compile a Retention Schedule for Records pertaining to its Substantive Functions which has to be vetted by the Divisional Head.

8.6 Retention schedule for files put up on SCILAL website

Files placed on the SCILAL website should have a defined removal date. The file should be archived on the specified date.

The disclosure of all material events or information which have been disclosed to stock exchange(s) shall be hosted and retained on the Company's website for a minimum period of 5 (five) years. Thereafter all such hosting shall remain archived for a period of subsequent 3 (three) years by adopting appropriate technology.

8.7 Retention Period

For the purpose of prescribing the retention periods, the classification of the records into Category should be done.

The retention period is the period a particular agency is required to keep the records before their final disposition. While compiling the Records Retention Schedule, the subject-heads as well as the retention periods of the similar record-series under different divisions/ branches/ sections/ units/ cells etc. may be checked with a view to ensuring standardization of nomenclature and the periods of retention.

After listing the subject-heads and their sub-heads/ records-groups, their retention periods are prescribed in accordance with their reference value and the importance of the subject

8.8 Format of Record Register (with retention details)

The Records Retention Schedule is to be prepared by the RCA in the format which contains the following columns:

1. Sr No
2. Division
3. Department
4. File number
5. File Type (Short abbreviation of the File)
6. File description
7. Category (A/B/C) -
8. Fin Year (This is requires so that for every year new box file is maintained)
9. Number of years to retain
10. Opened on
11. Closed on
12. Storage area – office / outsourced

13. If outsourced then carton no and file number
14. Physical Location (MTI/HO/other location)
 - Floor
 - Room No
 - Cupboard
 - Shelf No.
15. Digital Location (Shared Folder /Others)
16. Path of digital Location
17. Search parameters eg Asset / EC No/ Case no. etc
18. Expiry date (depending on the retention years)
19. Record Status (Active/ Destroyed)
20. Management Note No. and date of approval for destruction
21. Date of destruction
22. Mode of destruction

9.0 DESTRUCTION OF RECORDS

9.1 Documents / records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use. Any of the documents of Category B, or C which are not required to be maintained and preserved permanently shall be destroyed.

9.2 The documents / records may be disposed of after the expiry of the periods of their preservation, after the approval of the Divisional Head through Departmental head.

9.3 No record shall be destroyed without being recorded and reviewed.

9.4 Periodically, not exceeding one year, each record creating agency shall record after consulting the records retention Schedule all those files on which action has been completed. The work shall be accomplished in consultation with the records officer.

9.5 The old records beyond the certain specified period as per Company policy, to be destroyed regularly and record of the destructions to be maintained by Record Officer.

9.6 The records which are required to be destroyed shall be listed properly and retained permanently for future reference. A list of all such records which are proposed to be destroyed shall be prepared by the record creating agency and retained permanently for future reference.

9.7 Record shall be destroyed either by burning or shredding in presence of Record Officer/ officer nominated by the concerned Director.

9.8 The records officer shall furnish a half yearly report on recording, indexing. Reviewing and weeding of incremental records to the Divisional Head.

10.0 REPORT OF DESTRUCTION OF RECORDS

10.1 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.

10.2 The record of disposal of records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or electronic form.

11.0 COMPLIANCE OF DOCUMENTATION POLICY

11.1 The compliance officer i.e. Company Secretary will confirm the documentation policy.

11.2 Audit

The compliance and maintenance of the documentation policy will be checked by internal auditors at least once in a year to ensure that policies implemented in proper manner and status report will be submitted to board.

11.3 Training

For satisfactory implementation of policy, the record officer may be required to undergo orientation course in records management. HRD will identify such courses and nominate record officer for such training.

11.4 Reporting

Submission of Annual Report –The RO / DRO shall furnish an Annual Report every year in the month of March to the Divisional Head and CRO. This report will contain the following details:

1. Division

2. Department

3. Total Files as at the beginning of the financial year

Category A

Category B

Category C

4. Number of files stored in office

5. Number of files stored in outsourced storage

6. Number of files destroyed during the year

Category A

Category B

Category C

7. Files at the end of the financial year

Category A

Category B

Category C

12.0 MODIFICATIONS AND AMENDMENTS TO THE POLICY

12.1 Any subsequent notification, circular, guidelines or amendment under Companies Act, 2013 / SEBI Regulations, Accounting Standards and all other applicable laws, as the case may be issued from time to time shall be mutatis mutandis applicable, even without any further modification or amendment in this policy.

12.2 Any subsequent notification, circular, guidelines or amendments in the following may forthwith be implemented by the Company and consequent changes in this Policy shall be carried out with approval from Chairperson & Managing Director of SCILAL and be communicated on the relevant platform:

- The SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015,
- The Companies Act, 2013 and rules made there under
- Any other statutory or regulatory law.

Provided the Board is kept informed about the said amendment at the first Board Meeting held after such amendment.

12.3 Any amendment for the reasons other than those mentioned above shall need approval by the Board of Directors.

13.0 REVIEW OF DOCUMENTATION POLICY

The corporate documentation policy will be reviewed once in every two years after taking views of all divisions of SCILAL.

14.0 LIMITATION

In the event of any conflict between the provisions of this Policy and SEBI Listing Regulations/ Companies Act, 2013 or any other statutory enactments, rules, then, the provisions SEBI Listing Regulations / Companies Act, 2013 or other statutory enactments, rules, as the case may be shall prevail over this Policy and shall be adhered to accordingly by all concerned.

SCHEDULE OF AMENDMENTS TO THE POLICY

Version No.	Financial Year	Changes/Comments	Approved by	Date of Approval
1	2023-24	Initially adopted	Board of Directors	08-05-2023
2	2025-26	Amended	Board of Directors	06-05-2025