XPRO INDIA LIMITED

Policy for Preservation of Documents

Preliminary:

Every organization in the course of its work generates documents and records in physical or electronic form. For historical and legal purposes, the records are required to be maintained either permanently or for a limited period of time and in this, the Company has been guided by legal requirements and Board instructions.

This Policy recognizes the challenges in maintaining accessibility and authenticity of records and has been framed so as to meet the requirements of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Policy:

The preservation of documents is the responsibility of the respective functional/departmental heads.

The documents need to be properly and safely preserved and should be readily accessible. The documents may be preserved in physical form and to the extent feasible, in electronic form.

The documents which are deemed to be so important or are under law required to be preserved permanently shall be so preserved and wherever possible, be backed up in electronic form. Very Important documents shall be preserved in fire proof cabinet facility as available.

Documents which are not required to be preserved permanently shall be preserved for a period of atleast 8 years after completion of the relevant transactions. Such documents shall be kept in the record room and a list of the same should be prepared for easy location of the same. After the relevant period is over, the old documents should be reviewed and weeded out by the respective functional/departmental heads and destroyed in consultation with accounts and legal departments in accordance with the procedure, if any, prescribed under law. Ongoing Government and legal proceedings may require certain documents to be retained for a longer period till the proceedings are completely over and such documents should be appropriately preserved.

Proper care shall be taken to maintain the confidentiality of documents while preserving or destroying the documents.

This policy has been adopted by the Board of Directors at its meeting held on November 3, 2015 and shall be effective from December 1, 2015.