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| Policy Domain | IT Asset Disposal Policy | Creation Date | 10 th Feb 2021 |
| | | Classification | Internal |
| | | Version | 1.0 |
| | | Doc. Owner | IT Head |

| Document Control | | | |
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Document Control

- This document is subject to version control and shall be managed by IT Head. Any request for amending this document shall be approved by Director. The IT Head shall review this document at least once in a year and/or when there is a significant change in technology adopted, business objectives, identified threats, legal environment, social climate and business processes.
- The document is available on Helpdesk Portal under Announcement and Server shared folder under AETL Policies and provided with HR Joining Kit, in non-editable pdf format and all the employees are expected to read and adhere to it. The approved and signed copies are available with IT Team, which can be used for audit purpose only. IT Team is responsible for maintaining updated copy of this document and its effective communication within Advanced Enzymes (AETL).

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1. Overview

Information and IT equipment are vital assets to any organization. Virtually all of our activities involve creating or handling information in one form or another via the IT equipment we use. The IT Asset Disposal Policy and its associated policies are concerned with managing the secure disposal of IT equipment assets which are owned by AETL and are no longer required.

2. Scope

2.1 The Disposal Policy applies to all the employees, business partners, third parties, whoever using AETL IT systems. All the locations including sales offices, marketing team, RO, Division offices, plants, warehouses and corporate are covered under this policy.

2.2 This policy applies to all personal computers / Laptops, other computing devices, network devices and accessory equipment that store / communicate / used to process electronic data, information, software programs and applications.

3. Purpose

3.1 Computer equipment or electronic equipment with printed circuit boards contains heavy metals, environmental toxins, and other hazardous materials. The proper disposal of this equipment is essential to avoid liability and to be an environmentally responsible corporate citizen.

3.2 In addition, computer hard disks may contain personal, confidential, and legally protected information that is still readable even when the files have been erased or the hard drive reformatted. Failure to destroy this information could lead to unauthorized access, identity theft, and liability to the company.

3.3 This policy outlines disposal requirements for protecting these IT assets by either of two methods: (1) destruction of the IT device; or, (2) complete removal of all electronic data from the computer storage device. The company must perform at least one of these actions before disposing of the device.

4. Policy

AETL has defined policy for disposal of IT Asset's (including Data, Hardware and IT accessories) that is surplus / redundant / scrapped / outdated for use is as follows.

1.1. All such equipment's would be transferred to a central location as defined by IT team.

1.2. All such equipment that cannot be put in re use and IT Infra team has declared as scraped and put up a proposal for disposal to management with residual value may be either auctioned to the employees of the company or sold, either as part trade-in against new equipment or to an approved e-waste recycler or donated to charitable organization or community project as per approval of Management.

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1.3. All such equipment's approved by management for disposal would be duly notified to Accounts/Finance team for appropriate adjustment in books of accounts and cleared from fixed assets register. Accounts/Finance team would ensure for clearance for all such written off in books and confirm to IT.

1.4. To facilitate adherence to the Pollution control and e-waste management and other laws in this respect, all computer hardware must be disposed of through the IT Department.

5. Procedure

To comply with the requirements of the Company's above policy, the following mechanisms have been put in place.

4.1 A department having surplus or redundant IT Asset shall immediately inform this fact to his department head under a copy to IT Dept.

4.2 All equipment for disposal will be collected at the IT Dept. where it will be reviewed for possible internal redistribution and/or other disposal as per the policy above.

4.3 Hardware that can be used to replace older equipment elsewhere in the company will be refurbished / rebuilt to the standard build and redistributed. Any returned equipment will be processed as required.

4.4 All Data and Software installed on such equipment's is removed with the consent of concern user / function and hard disks is partitioned and formatted.

4.5 Systems which have been declared for no further use by IT function are cleaned, tested and evaluated for method of disposal. All such systems are proposed for disposal and in an environmentally approved manner at no cost to the Company.

4.6 IT Department disposes these equipment's to e-waste recyclers, who in turn certifies that all the e-waste material has been disposed as per the e-waste disposal laws or give it as donation on Management approval.

4.7 Assets identified and need to be sell / scraped / donate /write off tentative sale price to be mentioned against each item by IT team in proper format as described in Annexure 1. After compilation of final sheet, the data to be shared with accounts department for compilation and updating their records.

6. Importance of Data and Software Removal

5.1 There are a number of considerations to be made when moving or disposing of computer hardware. PCs may have company's sensitive data on the hard disk, this must be removed and where appropriate backed up

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and / or transferred to another PC. This is to satisfy the requirements of the Data Protection Act and to protect the company from the results of leakage of sensitive information.

5.2 All PCs and laptops are purchased with an Operating System license. This license is tied to the PC that it was supplied with and therefore cannot be retained for use with another PC. The PC can be disposed of with its original license in place but only where the original licensing documentation is available.

5.3 Software like MSOffice, Adobe etc. is purchased and licensed for use within the company and is therefore not transferable with a PC. All software must be removed from hardware that is being disposed of.

5.4 To ensure that these considerations are taken into account all PCs must be disposed of through the IT Department.

7. Deleting Data - Technical Aspects

7.1 Before disposing of any computer system, it is vital to remove all traces of data files, company licensed software and operating systems.

7.2 Merely deleting the visible files is not sufficient to achieve this, since data recovery Software could be used by a new owner to “undelete” such files. The disk-space previously used by deleted files needs to be overwritten with new, meaningless data - either some fixed pattern (e.g. binary zeroes) or random data. Similarly, reformatting the whole hard disk may not in itself prevent the recovery of old data as it is possible for disks to be “unformatted”.

7.3 There are a number of tools like Eraser, DBAN available for fully wiping hard disks that will completely wipe the contents of any specified files, or the whole of the free space on the disk.

7.4 A better approach is to use a Degausser to remove the data completely or format the hard disk, installing a clean copy of the original operating system, and then run a suitable application on the free space. This should leave a machine in a suitable state for disposal.

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8. Roles & Responsibility Matrix (RACI)

| Activity \ Role | IT Head | ISMS Steering Committee | Internal Users | External Users | Exempted |
|------------------------------|---------|-------------------------|----------------|----------------|----------|
| Authoring of this document | RA | RA | - | - | - |
| Approval of this document | I | CI | - | - | - |
| Sign-off of this document | CI | CI | - | - | - |
| Application of this document | RA | RA | RA | - | - |
| | | | | | |

| | |
|---|-------------|
| R | Responsible |
| A | Accountable |
| C | Consulted |
| I | Informed |

9. Policy Review

The policy will be reviewed every year or if there is any major change in IT Infrastructure to incorporate changes if any.

IT Team will be responsible for reviewing the policy and communicating the changes made therein.

10. ISMS Steering Committee Members

1. Mukund Kabra (Director)
2. B. P. Rauka (CFO)
3. Maruti Divekar (IT Head)

11. AETL IT Helpdesk Contact Details

- Logging an online support request: <http://192.168.2.7:8080>
- Email: it.helpdesk@advancedenzymes.com
- Telephone: **022 41703234**

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12. Annexure

12.1 Fixed IT Asset Disposal Format

| | |
|---|-------------------------------------|
| Name of Site / Branch | |
| Fixed Assets No. (SAP Asset Tag) | |
| Description of Assets | |
| Location of Assets to be disposed off | |
| Date of Purchase | |
| Purchase Price | |
| WDV as on 1 st April of Current FY | |
| Recommended Disposal Price | |
| | |
| Signature IT Head | Signature DIRECTOR / CFO |

12.2 Fixed Asset Sales Format

| Name of the Unit branch | | | | | | | | | | |
|---------------------------------|---------|----------|----------------|------------------------------------|----------------------------|----------------------------|----------|----------|---------------------------------|--------------------|
| Fixed Asset No. (SAP Asset Tag) | FA Name | Location | Purchase Price | WDV as on 1 st April FY | Recommended Disposal Price | GST inclusive or exclusive | HSN Code | GST Rate | Customer/ Vendor Name & Address | GST No. (Customer) |
| | | | | | | | | | | |