

## **Policy for Preservation & Archival of Documents**

### **1. Why this policy?**

This policy is in pursuance to Regulations of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”), on preservation and archival of the Documents to aid the employees in handling the Documents efficiently.

The words and phrases used in this Policy shall derive their meaning from the Applicable Law.

### **2. Coverage**

This Policy is intended to guide the Company and its officer on maintenance of any Documents, their preservation and disposal.

### **3. Classification**

The preservation of Documents shall be done in the following manner:

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is “Current”.
- c) In case of any other Document, for such period, as a competent officer of the Company required to be handle or deal with the Document takes a considered view about its relevance.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I

### **4. Modes of preservation**

4.1 The Documents may be preserved in

4.1.1 Physical Form or

4.1.2 Electronic Form.

In case of preservation of electronic records, a critically important factor to be considered is the inevitability of hardware, software and media obsolescence. These records must either be migrated to new versions or the old hardware and software must be retained in order to read the records. Migrating may also cause the records to change or lose their format, so good quality control procedures must be in place when migrating to ensure all information retains its original content, context and structure.

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

**Archival Policy-** All such events / information hosted on the Company's website shall be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015. After the initial period of 5 years, documents / information shall be archived for a further period of 3 years. Thereafter the same can be destroyed at discretion of Board of Directors of the Company.

#### **5. Authority to make alterations to the Policy**

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

#### **6. Interpretation**

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

**Annexure - I****Indicative list -**

Permanent Preservation	Temporary Preservation
<b>Companies Act, 2013</b>	
<ul style="list-style-type: none"> <li>• The memorandum and articles of the company</li> <li>• Affidavit from the subscribers to the memorandum and from persons named as the first directors</li> <li>• Register of members</li> <li>• Books and Documents relating to the issue of share certificates, including the blank forms of share certificates</li> <li>• Annual return</li> <li>• The foreign register of members</li> <li>• Register of charges</li> <li>• Minutes book of general meeting</li> </ul>	<ul style="list-style-type: none"> <li>• Register of charges (8 years)</li> <li>• Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)</li> <li>• Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)</li> <li>• Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)</li> <li>• All notices pertaining to disclosure of interest of directors</li> <li>• All certificates surrendered to a company (3 years from date of surrender) <ul style="list-style-type: none"> <li>• Register of deposits (not less than 8 years from the date of last entry)</li> <li>• Instrument creating a charge or modification (8 years from date of satisfaction of charge)</li> </ul> </li> </ul>
<b>Secretarial Standard</b>	
<ul style="list-style-type: none"> <li>• Minutes of Board meeting (SS-1)</li> </ul>	<ul style="list-style-type: none"> <li>• Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2)</li> </ul>
	<ul style="list-style-type: none"> <li>• Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 10 years or as long as they remain current.</li> </ul>