

POLICY FOR PRESERVATION OF DOCUMENTS

Pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

a. Documents to be preserved permanently

The Company shall preserve the following documents permanently:

Description of the Document	Remarks
Certificate of Incorporation	Original and Scanned copies
Certificate of Commencement of Business	Original and Scanned copies
Memorandum & Articles of Association, as amended from time to time	Printed Copies and/or scanned copies
Minutes of the meetings of the Shareholders, Board and Committees	Original signed as per the relevant regulations (physical or electronic)
Agreements, if any, entered into with the Promoters or between/among the Promoters to which the Company is a Party.	Original or counterpart or copy as may be available
Licenses/ Registration Certificates issued by various authorities relating to Income Tax, Sales Tax, Customs, Central Excise, Service Tax, Directorate of Industrial Safety, local bodies, Employees Provident Fund, Employees State Insurance, Environment, safety, etc	As far as possible originals shall be preserved except where the same is surrendered to the authorities for getting a new certificate or otherwise. In such cases certified copies or photocopies shall be preserved.
Accounting and other operating manuals as amended from time to time	Original or copies
Standard Operating Procedures relating to the various activities of the Company	Original or copies
Joint Venture Agreements, Technical Knowhow Agreements, manuals, drawings and other related documents	Original or copies
Annual Reports	Printed or Photocopies (at least one copy) or scanned copy
Annual Returns filed under the Companies Act, 1956/2013	Original or copies or scanned copies
Building approvals, drawings and related documents	Original
Documents relating to the land owned by the Company	Original Deeds and Agreements entered by the Company and original/copies of parent documents as made available to the Company by the Vendor(s) at the time of acquiring the property. Where the documents are deposited with any bank or FI or other person to secure any borrowings or otherwise, photocopies shall be available on file.
Approved Standing Orders, Agreements with Labour Unions	Original or copies



Agreements which do not specify any validity period and have permanent force	Original or copies
Prospectus, Letters of Offer and other similar documents	Printed or scanned copies
Other documents as may be prescribed under any law for the time being force to be preserved permanently.	The relevant statutory requirements are to be complied with.

b. Documents to be preserved for not less than eight years

The following documents shall be preserved for a period of not less than eight years.

- All books of accounts and related records
- Income Tax Returns, Assessment Orders and other related documents
- Sales Tax Returns, Assessment Orders and other related documents
- Excise Records
- Import documents
- Service Tax Records
- Insurance Policies, Claims and related documents
- Payroll Records

c. Other documents

- All agreements and other contracts (other than those covered under (a) and (b) above) shall be preserved for a minimum period of 3 years from the date of expiry.
- Documents not covered under any of the above are to be preserved for a minimum period of five years.

d. General

- The documents relating to issue of securities, share transfer, transmission, split, consolidation, issue of share certificates and other connected matters will be maintained by the Registrar and Share Transfer Agent in such manner and for the periods specified under the relevant law.
- Where any litigation / dispute or any investigation by any regulatory body is pending the relevant documents, irrespective the periods stated above, shall be preserved for at least three years after the final disposal of the litigation or resolution of the dispute or as the regulatory body may direct.
- Where the period of preservation is longer under any law for the time being in force, the same shall be followed.
- For destruction of documents maintained by the Company, prior approval of the Whole-time Director shall be obtained in writing, and the manner of disposal or destruction shall be specified in such approval.
- The Company shall maintain a register containing the particulars of documents destroyed, date & mode of destruction and such entries shall be authenticated by the Company Secretary and the register of destruction of records shall be preserved permanently.
- The Head of the Functional Department concerned shall be responsible for preservation of the documents as stated above. Where more than one department is involved, the custody of the original documents, if any, shall be decided mutually.

In any case, copies of the same shall be maintained by all or as the case may be the other departments.

- All the physical records shall be preserved in fireproof safes as far as possible and in a proper manner for easy location and retrieval.
- Where documents are maintained in electronic form, sufficient back-ups should be in place.
- In case of documents/information uploaded in the Website of the Company, the same shall be archived after the mandatory period and preserved for further five years.
- The Head of the Department concerned shall be free to preserve the records for longer period or permanently, if he is of the opinion that it is so warranted.
- In case of any issues relating to interpretation of the above policy, the same shall be referred to the Whole-time Director for final decision.
- Any change to this Policy can be made by the Board from time to time as may be deemed necessary.

Last reviewed by the Board of Directors at its meeting held on 02nd November 2023
