

Document Archival Policy

I **Objective** : The purpose of this Document Archival Policy is to provide a comprehensive policy on the preservation and conservation of the Company's records and documents. It provides guidance on the preservation and management of documents to help ensure the authenticity, reliability and accessibility of such documents. The policy aims at identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records. It stipulates the duration and manner in and place at which records and documents of the Company shall be preserved

II **Type of Documents** :

- (1) Company's records and documents can be basically bifurcated into physical and electronic records. Documents can also be categorised into documents to be preserved for limited life span and those to be preserved permanently
- (2) Physical records would consist of all the hand written or printed and signed books and records maintained by the Company in paper form. Electronic records would comprise of all such documents which are digitally or virtually maintained in the electronic forms. Electronic record may or may not be authenticated by digital signatures

III **Place of Preservation of documents & Records** :

- (1) All statutory records and documents along with all the supportive documents shall be maintained at the registered office of the Company. All the documents required to be maintained under the Companies Act, 2013, Secretarial Standards, Listing Regulations, SEBI Regulations, FEMA shall be preserved under the custody of the Company Secretary of the Company. All Financials records required to be maintained under the Companies Act, 2013, Accounting Standards, Income tax Act, 1961, Service Tax Act and the Central Goods and Services Tax Act and related Acts shall be maintained under the custody of the Chief Financial Officer of the Company. All documents required to be maintained under the provisions of applicable labour laws shall be maintained under the custody of the Head of Human resource department of the Company

- (2) For paucity of space at the registered office of the Company, data which is not statutorily required to be maintained at the registered office of the Company may be kept at an external storage facility, provided that the data so preserved is capable of being easily accessed and retrieved when need be

IV Method of Preservation :

- (1) All the statutory documents shall be preserved for such duration as has been prescribed in the relevant statutes. Documents shall be preserved in a chronological manner for each financial year. The person in charge of custody of the documents shall be responsible for proper maintenance and safe keeping of documents under his custody
- (2) The Company shall keep back up of documents maintained in the electronic form as per the Company and Group IT policy
- (3) Documents which are confidential in nature shall wherever possible be kept under lock and key and shall be shared on need to know basis only with persons directly involved in the transaction involving such documents and records

V Inspection & Investigation :

- (1) Some of the registers and records are required to be kept open by a Company for inspection by directors and members of the Company and by other persons, including creditors of the Company. Upon receipt of advance notice from a member or from any other specified person the Company shall facilitate inspection of such documents by such persons and allow extracts to be taken from certain documents, registers and records and to furnish copies of certain documents, registers and records. Such documents and records shall be kept open for inspection during the business hours of the Company without payment of any fee
- (2) Government authorities have the right of access to all registers and records. The Government may order investigation into the affairs of the Company and may order seal and seizure of documents and records. In such an eventuality the Company and its officers shall support and assist the government officers in every possible way

- VI Tenor of maintenance** : All statutory documents and records shall be preserved for such period and at such place manner as has been prescribed under the relevant statute
- VII Documents hosted on the Company website** : Documents which are statutorily required to be hosted on the Company website shall be hosted within the prescribed timeline from the occurrence of the event. All statutory data shall be hosted on the Company website for a minimum period of five years. After which it shall be preserved in the Archival folder of the Company maintained offline until it is destroyed upon the expiry of the statutory period for the preservation such documents
- VIII Register of documents destroyed to be maintained** : Documents and records may be destroyed after the expiry of the statutory period for the preservation the documents after keeping a suitable record of documents destroyed after obtaining necessary approvals from the Board of Directors