

RECORDS AND ARCHIVES MANAGEMENT POLICY

This Policy for archival of disclosures to Stock Exchanges and preservation of documents has been prepared in compliance with Regulation 9 and 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

POLICY:

- A) All disclosures made under Regulation 30 of the SEBI (Listing Regulations and Listing Obligations) Regulations 2015 by the Company to the Stock Exchange, where equity shares of the Company is listed, shall be kept on the website of the Company for a period of five (5) years and thereafter the information would be archived under the heading "Past Events / Information" and would be retained on the website for such period as may be decided by the Chairman / Managing Director from time to time, subject to applicable law.
- B) This policy sets the standards for managing, storing and preservation of documents of the Company which are broadly classified in the following two categories:
 - (a) Documents whose preservation shall be permanent in nature (listed in **Annexure-1**) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.
 - (b) Documents with preservation period of not less than eight years after completion of the relevant transactions (listed in **Annexure-2**) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided further that the Company may also keep the documents as specified above in an electronic mode.

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation, for the time being in force.

AMENDMENT:

The Board of Directors of the Company is authorized to make necessary changes to the above policy as and when required. If any change is necessary to be made due to statutory amendments, the same may be made with the approval of the Managing Director of the Company and the same shall be placed at the next meeting of the Board of Directors for its information and ratification.

The policy and any amendment thereof as and when carried out, shall be disclosed on the Company's website.

Annexure 1

Documents whose preservation shall be permanent in nature

| Sr. No. | Nature of Documents |
|---------|--|
| 1. | Common Seal |
| 2. | Minutes Books of Board, General Meetings and Committees Meetings |
| 3. | Statutory Registers |
| 4. | Scrutinizers' Reports |
| 5. | Register of Members |
| 6. | Licenses & Statutory Approvals |
| 7. | Agreements made by the Company with Stock Exchanges, Depositories, etc. |
| 8. | Material Agreements / Contracts |
| 9. | Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time. |
| 10. | Investments Documents / Proofs including certificate |

Annexure 2

Documents with preservation period of not less than eight years after completion of the relevant transactions

| Sr. No. | Nature of Documents |
|---------|--|
| 1. | Books of Accounts |
| 2. | Annual Returns |
| 3. | Attendance Register |
| 4. | Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013. |
| 5. | Income Tax Returns filed under Income Tax Act, 1961 |
| 6. | Copy of newspaper advertisement or publications |
| 7. | Correspondences with Departments / shareholders |
| 8. | Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time. |
| 9. | Non-Statutory Registers / Documents |