



**ADITYA INFOTECH LIMITED**

**POLICY ON PRESERVATION OF DOCUMENTS**

**Version 1.0**

<b>Policy Version</b>	<b>Date of Board approval</b>	<b>Effective Date</b>
<b>Version 1.0</b>	<b>December 17, 2024</b>	<b>December 17, 2024</b>

## Table of Contents

---

Introduction.....	3
Definitions.....	3
Effective Date.....	3
Documents to be Preserved.....	3
Responsibility.....	5
Mode of Maintenance.....	5
Destruction of Documents.....	5
Dissemination of the Policy.....	5
General.....	5
Scope and Limitation.....	5
Policy Review.....	5
Annexure-1.....	6
Annexure-2.....	8
Annexure-3.....	12

## **POLICY ON PRESERVATION OF DOCUMENTS**

### **INTRODUCTION**

Aditya Infotech Limited (hereinafter referred as “Company”) recognizes the importance of maintaining accurate and complete records to ensure transparency, accountability, and compliance with legal and regulatory framework. The Board of Directors of the Company in pursuance of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) and Companies Act, 2013 and the rules made thereunder and other applicable provisions (including any statutory enactments/amendments thereof), adopted the following policy for preservation of documents (“Policy”) classifying them in four categories i.e. (a) documents whose preservation shall be permanent in nature; (b) documents with preservation period of not less than eight years after completion of the relevant transactions; (c) General and (d) Documents to be made available on the website of the company as required under the Companies Act, 2013 and the SEBI Listing Regulations. Further Regulation 30 (8) of the SEBI Listing Regulations refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

In accordance with the above Regulation 9, Regulation 30 (8) of SEBI Listing Regulations and the provisions of the Companies Act, 2013, and other applicable provisions of law, the Company has framed the Policy namely “Policy on Preservation of Documents” in line with the existing provisions of the SEBI Listing Regulations and the Companies Act, 2013. Any future changes in the SEBI Listing Regulations will, *ipso facto*, apply to this Policy.

### **DEFINITIONS**

“**Act**” means Companies Act, 2013 and the rules made therein, and any amendments made thereto from time to time.

“**Board**” means the Board of directors of the Company or any of the Committees constituted by it.

“**Documents**” or “**Records**” mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official records of the Company.

“**Electronic form**” means electronic form as defined under clause (r) of sub-section (1) of section 2 of the Information Technology Act, 2000.

“**Preservation**” or “**preserve**” means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.

“**Regulations**” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments made thereto from time to time, hereinafter may be referred as “SEBI Listing Regulations”.

### **EFFECTIVE DATE**

The Policy shall come into force with effect from the date Regulation 9 of the SEBI Listing Regulations takes effect with respect to the Company.

### **DOCUMENTS TO BE PRESERVED**

This Policy sets the standards for preservation of documents of the Company, broadly classified in the following categories, which may be preserved, in physical and/or electronic form.

#### **(i) Category A – Documents whose preservation shall be permanent in nature**

**Annexure 1** of this Policy contains the details of documents whose preservation shall be permanent in nature. All modifications, amendments, additions, and deletions to the said documents shall also be preserved permanently by the Company.

**(ii) Category B – Documents to be preserved for not less than eight years after completion of the relevant transaction.**

**Annexure 2** of this Policy contains the details of documents with preservation period of not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, and deletions to the said documents shall also be preserved for a term not less than eight years.

**(iii) Category C – General**

In addition to the documents mentioned in sub-clause (i) and (ii) above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and shall be preserved for a stipulated period of time as per the existing rules/ procedures/ practices of the Company or as per the applicable statutory/ regulatory provisions in this regard.

Further, certain documents mandated under the Companies Act, 2013 do not have any specific preservation period prescribed. Such documents shall be preserved by the Company on a permanent basis unless otherwise specified by any statutory or regulatory provisions. **Annexure 3** attached herewith contains the details of documents with preservation period other than those mentioned in sub-clause (i) and (ii) above.

**(iv) Category D - Documents to be made available on the website of the company as required by the Companies Act, 2013 and the SEBI Listing Regulations**

- a) The Company shall maintain a functional website containing:
  - The basic information about the Company,
  - All information and/or documents as specified in the applicable provisions of Companies Act, 2013,
  - All information and/or documents as specified in Regulation 46(2) of the SEBI Listing Regulations,
  - All information and/or documents mentioned in Part (B) of Annexure 2 of this Policy, which are required to be made available on the website of the Company, and
  - All information and/or documents as mentioned in Regulation 30 of the SEBI Listing Regulations on material events.
- b) The Company shall ensure that contents of the website shall carry all true and correct information.
- c) The Company shall update any change in the content of its website within two working days from the date of such change in content.
- d) Information and/or documents required to be made available under Regulation 30 of the SEBI Listing Regulations shall be made available on the website simultaneously with disclosure to stock exchanges.
- e) The information and/or documents relating to all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of company for a minimum period of five years.
- f) Information and/ or documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz.
- g) The information and/or documents shall be arranged financial year wise with further segregation into four quarters of the financial year.
- h) All policies etc. or the information/ documents of a general nature shall be clubbed together at one place.

## **RESPONSIBILITY**

The heads of respective departments of the Company shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each one of them.

## **MODE OF MAINTENANCE**

The Company shall maintain these records either in physical or electronic form. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company.

All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under applicable law.

For all physical as well as electronic Documents, the heads of the respective business divisions/ departments of the Company shall be responsible for preservation of such Records, Documents. The preservation of the records should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the records. The preserved records must be accessible at all reasonable times. Access may be controlled by the heads of the respective business divisions/ departments with preservation, so as to ensure integrity of the records and prohibit unauthorised access.

## **DESTRUCTION OF DOCUMENTS**

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/ concerned Functional Director/ Head of the Department. This applies to both physical and electronic documents.

After the expiry of time mentioned in Category D- Point (iv) (e) of this Policy, the information and/or document shall be removed from the main website. The backup of such information and/or document which is removed from the main website shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years the backup may be permanently removed from the server as may be decided by the Management.

## **DISSEMINATION OF THE POLICY**

The Policy, as amended from time to time, shall be placed on the website of the Company,

## **GENERAL**

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

## **SCOPE AND LIMITATION**

In the event of any conflict between the provisions of this Policy and the Act or SEBI Listing Regulations or any other statutory enactments, modification or rules, the provisions of SEBI Listing Regulations / Act or statutory modification, enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to be severed from the Policy and the rest of the Policy shall remain in force.

## **POLICY REVIEW**

The Board may subject to applicable laws is entitled to amend, suspend or rescind this Policy at any time. Any difficulties or ambiguities in the Policy will be resolved by the Board in line with the broad intent of the Policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy.

**Annexure - 1**

**Documents preservation of which is permanent in nature**

Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1	Copies of all documents and information as originally filed under section 7(1) (incorporation) till dissolution under the Companies Act, 2013	Registered office	Company Secretary or any other person authorized by the Board for the purpose	Sec 7(4) of the Companies Act, 2013	Permanent, till dissolution of the company
2	Register of Renewed and Duplicate Share Certificates in <b>Form SH-2</b>	Registered office of the company or at such other place where the Register of Members is kept	Company Secretary or any other person authorized by the Board for the purpose.	Rule 6 (3) of Companies (Share Capital and Debenture) Rules, 2014	Permanent
3.	Share certificate forms and related books and documents – <b>Disputed cases</b>	Registered office	Company Secretary or if there is no company secretary, any director or any other officer authorised by the Board for the purpose	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	Permanent
4.	Register of Charges in <b>Form CHG-7</b>	Registered office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	Permanent
5.	Register of Members, as maintained by a depository under section 11 of the Depositories Act, 1996	Maintained by a depository	Maintained by a depository	Rule 15(1) of the Companies (Management and Administration) Rules, 2014 read with section 88 of the Companies Act, 2013	Permanent
6.	Foreign Register of Members	Maintained by a depository	Maintained by a depository	Rule 15 (4) of the Companies (Management and Administration) Rules, 2014	Preserved permanently unless it is discontinued and all the entries are transferred to any other foreign register or to the principal register

7.	Minutes books of general meetings	Registered Office	Company Secretary or any director duly authorized by the Board for the purpose	Rule 25(1)(e) of the Companies (Management and Administration) Rules, 2014	Permanent
8.	Minutes books of the Board and committee meetings	Registered office or such place as Board may decide	Company Secretary or any director duly authorized by the Board for the purpose	Rule 25(1)(f) of the Companies (Management and Administration) Rules, 2014	Permanent
9.	Register in <b>form MBP-2 u/s 186 of the Companies Act, 2013</b> (loan/ guarantee/ security or making an acquisition of securities)	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 12(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
10.	Register in <b>form MBP-3 u/s 187 of the Companies Act, 2013</b> (investment held in the name of any other person)	Registered Office	Company Secretary or if there is no company secretary, any director or any other officer authorised by the Board for the purpose.	Rule 14(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
10.	Register in <b>Form MBP-4 u/s 189 of the Companies Act, 2013</b> (Register of Contracts or Arrangements in which directors are interested as per section 184 & 188 of the Act)	Registered Office	Company Secretary or any other person authorised by the Board for the purpose	Rule 16(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent

**Note:** Property records including purchase and sale deeds, licences, copyrights, patents & trademarks shall also be reserved permanently.

**Annexure – 2**

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

**A) Mandated under Companies Act, 2013**

Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1.	Instrument creating charge or modification thereon	Registered Office	Company Secretary any other person authorised by the Board for the purpose.	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	8 years from the date of satisfaction of charge by the company
2.	Register of debenture holders or any other security holders along with the index	Registered Office	Company Secretary any other person authorised by the Board for the purpose.	Rule 15 (2) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of debentures or securities.
3.	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto	Registered Office	Company Secretary	Rule 15 (3) of the Companies (Management and Administration) Rules, 2014	8 years from the date of filing with the Registrar of Companies.
4.	Foreign register of debenture holders or any other security holders	Registered Office	Company Secretary any other person authorised by the Board for the purpose.	Rule 15 (4) & (5) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of such debentures or securities.
5.	All notices for disclosure of concern/ interest received u/s 184 of the Companies Act, 2013	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	8 years from the end of the financial year to which it relates
6.	Register of Deposits accepted or renewed	Registered Office	Company Secretary any other person authorised by the Board for the purpose.	Rule 14(3) of The Companies (Acceptance of Deposits) Rules, 2014	Not less than 8 years from the financial year in which the latest entry is made in the register
7.	The attendance register of Board & Committee Meetings	Registered Office	Company Secretary or Where there is no Company Secretary, any other person authorised by the Board for this purpose	4.1.6 & 4.1.7 of Secretarial standards-1	8 financial years from the date of last entry made therein and may be destroyed thereafter with the approval of the Board.



8.	Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the company	Registered Office	Company Secretary or Where there is no Company Secretary, any other person authorised by the Board for this purpose	8.2 of Secretarial Standards-1	As long as they remain current or for 8 financial years whichever is later and may be destroyed thereafter with the approval of the Board
9.	Office copies of general meeting Notices, scrutinizers report and other related papers of the company	Registered Office	Company Secretary Where there is no Company Secretary, any other person authorized by the Board for this purpose	18.2 (Secretarial Standards-2)	As long as they remain current or for 8 financial years whichever is later
10.	Any other register /documents required by any law, for the time being in force	Registered Office	Company Secretary		8 financial years
11.	Books of Accounts	Registered Office	CFO		8 financial years

**B) Illustrative list of Documents identified under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 apart from Documents mentioned in Annexure 1 & Annexure 2 (Part A)**

Sl. No.	Document	Provision	Regulation n no.	Period
1	Compliance certificate (for compliance of Reg. 7(2) signed by compliance officer & share transfer agent)	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	7(3)	8 financial years
2	Statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	13(3)	8 financial years
3	Quarterly compliance report on corporate governance	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	27(2)	8 financial years
4	Prior intimation to stock exchange about the meeting of the board of directors in which any of the proposals prescribed therein is due to be considered	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	29	8 financial years
5	Disclosures of any material events or information	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	30	8 financial years*
6	Statement showing holding of securities and shareholding pattern separately for each class of securities	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	31	8 financial years
7	Statement of deviation(s) or variation(s) in the use of proceeds from the objects stated in the offer document or explanatory statement to the notice for the general meeting, for public issue, rights issue, preferential issue etc.	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	32	8 financial years
8	Quarterly and year-to-date standalone/ consolidated financial results	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	33(3)(a)	8 financial years
9	Annual Audited standalone/ consolidated financial results along with the results of the last quarter	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	33(3)(d)	8 financial years
9	As part of financial results for the half year by way of a note a statement of assets and liabilities as at the end of the half-year	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	33(3)(f)	8 financial years
10	Annual report	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	34	8 financial years

11	Annual Information Memorandum	in the manner specified by the Board from time to time	35	8 financial years
12	a certificate from a practicing company secretary, certifying that all certificates have been issued within thirty days of the date of lodgement for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/ allotment monies.	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	40(9)	8 financial years
13	Intimation of record date	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	42	8 financial years
14	Details regarding the voting results of general meetings	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	44	8 financial years
15	Any and all kinds of filing to Stock Exchanges, viz. Press Release, Investors Presentation, etc.	Within the prescribed timelines under SEBI Listing Regulations, as amended from time to time	-	8 financial years

*\*However the disclosures under Regulation 30 shall be hosted on the website for a minimum period of five years.*

**Annexure - 3**

**Documents with preservation period as mentioned in last Column of each entry**

Sl. No.	Document	Person responsible for custody	Reference of provision	Period
1.	Share certificate related books and documents <b>(other than disputed cases)</b>	Company Secretary or director duly authorised by the Board for the purpose.	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	30 years
2.	Share certificates surrendered to company immediately be defaced by stamping or printing the word "cancelled" in bold letter)	Company Secretary or any other person authorised by the Board for the purpose.	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	3 years from the date on which they were surrendered and may be destroyed thereafter

\*\*\*\*\*