



PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

aarvee engineering consultants limited



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PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

1. LEGAL FRAMEWORK AND OBJECTIVE

- 1.1 The Preservation of Documents and Archival Policy has been formulated in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Companies Act, 2013, which requires every listed entity to formulate and make available on its website, the Preservation of Documents and Archival policy.
- 1.2. The purpose of this Policy is to ensure that all necessary documents and records of the Company are adequately protected and preserved as per statutory requirements of applicable laws, and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving documents and records which are required to be maintained as per applicable statutory and regulatory requirements.

2. DEFINITIONS

- 2.1. “**Policy**” means this Preservation of Documents and Archival Policy.
- 2.2. “**Board of Directors**” shall mean the Board of Directors of the Company, as constituted from time to time.
- 2.3. “**Company**” means Aarvee Engineering Consultants Limited.
- 2.4. “**Documents**” refers to papers, books, notes, forms, files, registers, agreements, notice, disclosure, advertisement, requisition, orders, declaration, forms, correspondence, minutes, indices, mails, audio/video recordings, transcripts and or any other record, required to be maintained under applicable laws, either on physical or in electronic form.
- 2.5. “**Maintenance**” means keeping documents, either physically or in electronic form as may be permitted under Act / Regulations for the time being in force including authentication and custody of such documents.
- 2.6. “**Preservation**” means to keep in good order and to prevent from being altered, damaged or destroyed.
- 2.7. “**SEBI Listing Regulations**” means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.

3. PRESERVATION OF DOCUMENTS

- 3.1. The preservation of Documents shall be done in the following manner:
- 3.1.1. Certain Documents shall be preserved permanently, as required by applicable laws.



3.1.2. Certain Documents shall be preserved for a period of not less than 8 years, as required by applicable laws.

3.1.3. Where applicable laws require a document to be retained for a period shorter than 8 years, it shall be preserved for such shorter period as specified by those laws.

3.1.4. Where there is no requirement as per applicable laws, then for such period as the document pertains to a matter which is “Current”.

3.1.5. In case of any other Document, for such period as may be decided by the respective Board of Directors / Head of the Department after the completion of relevant transaction / event, taking a considered view about its relevance.

3.2. Indicative list of Documents which are to be maintained permanently:

The Company shall maintain the following documents on a permanent basis:

- Certificate of Incorporation
- Memorandum and Articles of Association
- Documents filed for incorporation
- Register of Renewed and Duplicate Share Certificate
- Register of Charges
- Register of Members and Record of Beneficial Owners
- Register of Loans and Investments
- Register of investment not held in its own name by the Company
- Register of Contract or arrangement in which director are interested
- Minutes of Board or Committee Meetings and resolution passed by circulations
- Minutes of the General Meetings of class of shareholders / creditors or resolutions passed by way of postal ballots
- Books and documents relating to the issue of share certificates including blank forms of share certificates
- License, documents, approvals etc. received from any government or regulatory authority
- Title deeds of properties
- Intellectual property documents
- Orders, Judgments of court or any adjudicating authority
- Documents under Company’s employee share-based incentive schemes.
- Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

3.3. Indicative list of Documents which are to be maintained for at least eight financial years:

- Books of account together with the vouchers relevant to any entry in such books of account
- Copies of all annual reports and annual returns



- Disclosure of Interest received from the directors of the Company in the manner prescribed
- Instrument creating a charge or modifying a charge, if any
- Register of deposits accepted or renewed, if any
- Correspondence with department/shareholders
- Non-Statutory registers/documents
- Certificates surrendered to a Company
- Press releases and publicly filed documents along with all documents filed with the stock exchanges
- Correspondences with departments/shareholders
- Employment records/personnel documents that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment, such as actions taken against the personnel.
- Relevant marketing and sales documents
- Legal documents and intellectual property records relating to the development and protection of the intellectual property rights
- Insurance policies of the Company
- Original lease agreements (provided there is no dispute / claim /litigation is pending. If any such dispute persists, it should be preserved till the dispute is settled / closed)
- Investment records (with respect to investments made in the normal course of business).

4. WEBSITE DISCLOSURES AND ARCHIVAL

The event / information disclosed to the stock exchanges including audio or video recordings, if and when applicable, disclosure of information having a bearing on the performance of the Company, price sensitive information, and such other information as required under Regulation 30 of the SEBI Listing Regulations and /or other applicable law shall be placed on the website of the Company under the section entitled “Investor Relations” for a minimum period of five years or such other period as prescribed by the Regulations and/or applicable law.

After completion of the minimum period of five years or such other period as prescribed by the Regulations and/or applicable law, the events or information shall be archived by the Company for a further period of two years.

5. MODE OF MAINTENANCE

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



6. DESTRUCTION OF DOCUMENTS

Records which no longer serve a useful purpose should be destroyed with the written approval of the respective Functional Head. Destruction as a normal administrative practice, can be usually carried out if Documents are duplicated, unimportant or for short term use only.

The modes of destruction of records can include methods like shredding, pulping, recycling etc. or any other mode for electronic records, such that it leaves no possibility for reconstruction of the records and information contained therein.

7. REVIEW / AMENDMENTS TO POLICY

The Policy would be reviewed on an annual basis by the Board of Directors. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors.

However, the amended regulatory requirements will supersede the existing Policy till the time Policy is suitably amended.

8. COMMUNICATION AND DISCLOSURE

Adoption of this policy shall be communicated to the stock exchange(s) where the Company's equity shares are listed. This policy shall also be disclosed on the website of the Company i.e. <https://aarvee.com/>.

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