

Document Preservation and Archival Policy

PREAMBLE

The Board of Directors (“Board”) of Partap Industries Limited (the “Company”) has adopted this Document Preservation and Archival Policy (the “Policy”) pursuant to Regulation 9 and Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR”) as amended from time to time.

The said provisions require the listed companies to have a policy for preservation of documents, approved by their board of directors, classifying the documents in at least two categories as follows:

1. Documents whose preservation shall be permanent in nature;
2. Documents with preservation period of not less than eight years after completion of the relevant transactions.

The Policy shall also be governed by any other laws and regulations as may be applicable to the Company.

OBJECTIVE

This Policy *inter alia* provides for the Preservation of the Documents (defined hereinafter) so that such Documents should be kept no longer than the period necessary for the proper conduct of the Company’s business. The Policy shall cover all business Records (defined hereinafter) of the Company including written, printed and recorded matter and Electronic Forms (defined hereinafter) of Records.

The Policy

1. is formulated to manage the Company’s information in a structured manner, to retain information for as long as it has a business purpose, to satisfy statutory or regulatory requirements, and to protect information which is vital to the Company; and
2. outlines the methodology for the archival of material information/ material events that have been disclosed to the stock exchanges where securities of the Company have been listed.

In the event of any inconsistency between this Policy and SEBI LODR, or any other Applicable Law, the SEBI LODR as amended from time to time, and/or the Applicable Law (defined hereinafter) will prevail over this Policy.

SCOPE

This Policy is applicable to all the departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

This Policy covers all information created, received, managed and retained by the Company (including all its units and division) in hard copy and electronic records in connection with the business of the Company including originals and copies of correspondence, recordings, work papers, video tapes, photographs, product specifications, reports etc.

DEFINITIONS

“Act” shall mean the Companies Act, 2013 read with the rules framed thereunder and each as amended from time to time;

“Applicable Law” means any law, regulations, rules, circulars, guidelines or standards applicable to the Company under which any guidelines/ provisions with regard to the Preservation and Archival of the Documents has been prescribed.

“Archival” means accumulation/storage of historical records on server/network or at a physical place.

“Board” shall mean the collective body of the directors of the Company constituted from time to time in line with the provisions of section 2 (10) the Act and Regulation 2(1)(d) of SEBI LODR;

“Company” Partap Industries Limited has been referred to as the Company in this Policy;

“Current Document(s)” means any document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

“Document(s)” or **“Records”** means a piece of written, printed, or electronic matter that provides information, evidence or records or serves as an official record of the Company and includes any summons, notice, requisition, order, declaration, forms or registers, agreements, notices, advertisements, requisitions, orders, declarations, correspondences, minutes, indices, registers and/or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

“Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company, or otherwise the Company has control over or access to it.

“Electronic Record(s)” means the electronic record as defined under section 2 (1)(t) of the Information Technology Act, 2000.

“Maintenance” means keeping the Documents, either physically or in Electronic Form.

“Policy” means this Document Preservation and Archival Policy adopted by the Board and as may be amended from time to time.

“Preservation” / to “Preserve” means to keep in good order and to prevent from being altered, damaged or destroyed.

“SEBI LODR” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be amended from time to time and any circulars, notifications or clarifications issued thereunder from time to time by the Securities and Exchange Board of India.

CLASSIFICATION

The Board of Directors have classified the Documents to be retained and Preserved as mentioned hereunder, in the manner detailed under Annexure

1. **Permanent Records:** Permanent Records are the Records which are of strategic importance and vital to the organization. These Records and Documents shall be kept permanently, such as Certificate of Incorporation/ Certificate of Change of Name, Memorandum and Articles of Association, Minutes of meetings of the members of the Company, the Board and its committees, statutory Registers which are required to be permanently maintained under the Act or Applicable Laws, registration certificate of trademark, patent and copyright and any other document which are required to be permanently maintained under the Act or Applicable Laws etc.

2. **Other Records:** Such Records as are required to be maintained for minimum 8 (eight) years on account of statutory considerations and are important from the perspective of financial record keeping, e.g. books of accounts, vouchers, financial statements, invoices and all contracts, agreements, deeds which are the basis for the financial transactions, annual returns, attendance sheet and agenda papers of Board and Committee meeting, statutory Registers which are required to be maintained for not less than 8 (eight) under the Act or Applicable Laws etc. should be preserved for minimum 8 (eight) years from the closure of the contract and whereas, any contract, agreement or deed shall be required to be preserved for minimum 8 (eight) years or as per the terms of such contract, whichever is higher.
3. **Temporary Records:** Temporary Records are the Records which are required to be retained as long as it has a business purpose or are required to be retained as per relevant business regulations e.g. operational documents such as rating letters, research reports, working papers, etc.

The above given list of the Documents is enumerative list which includes but not limited to the aforementioned documents.

The Documents concerning other routine matters and having substantial long-lasting consequences shall be Preserved by all concerned as may be decided by the Managing Director/CEO, CFO, and/or the respective divisional Heads of the Departments of the Company based upon usefulness and necessity.

MODE OF PRESERVATION & RESPONSIBILITY

The Documents may be preserved in physical form or Electronic Form. The Preservation of Documents 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 Documents. The CEO/ CFO and the divisional Heads of the Departments of the Company shall be responsible for maintenance of the Documents in their respective division/department taking into account this Policy prescribing the minimum period for maintenance of Documents and shall take decision to retain and Preserve or destroy the Documents pertaining to their division/department keeping in view ongoing or anticipated litigation(s), if any or any other statutory requirement.

ARCHIVAL

1. Archival Policy for submissions made to Stock Exchanges:

The Company shall also disclose on its website all such events or information which has been disclosed to the stock exchange(s) under Regulation 30(8) of the SEBI LODR, where the securities of the Company are listed. Documents submitted to the stock exchanges for dissemination to the stakeholders will be retained on the website of the Company for a minimum period of 5 (five) years.

The Documents may thereafter be shifted to the archive section of the website, where it shall be retained for period of one (1) year or such period as may be decided by the management of the Company from time to time.

2. Archival Policy for other information hosted on the website pursuant to applicable legislations:

All other Documents or information which are hosted on the website of the Company pursuant to any Applicable Law to the Company from time to time, shall be retained on the website for such minimum period of time as may be specified under such Applicable Law. The Documents may thereafter be shifted to the archive section of the website, where it shall be retained for such period as may be determined by the management of the Company.

3. Archival Policy for other information voluntarily hosted on the website:

All the Documents or information hosted on the website of the Company voluntarily by the management, shall be retained on the website/ archive section of the website for such period of time as may deem fit at the absolute discretion of the management of the Company.

GENERAL:

The Documents may be archived in physical and/or Electronic Form as the Board of the Company may deem fit. The Documents archived in Electronic Form shall be backed up automatically on a periodic basis. This Policy shall be hosted on website of the Company.

LIMITATION:

In the event of any conflict between the provisions of this Policy and of the Act or SEBI LODR or Applicable Laws or any amendments thereto, the provisions of the Act or SEBI LODR or Applicable Laws shall prevail over this Policy.

AMENDMENTS AND REVIEWS:

This Policy has been adopted by the Board and the Board may review and amend the Policy, as and when required to do so due to regulatory changes or under any other circumstances necessitating revision to the Policy.

Approved on 14th November 2021