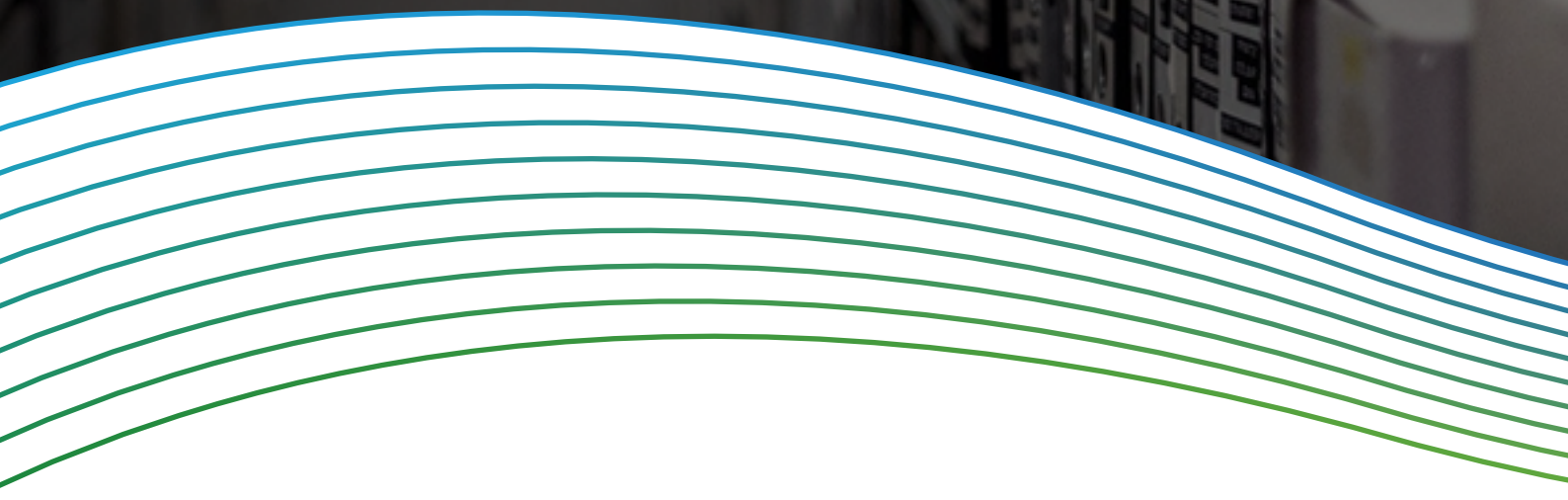


Policy on **Preservation and Archival of Documents**

Avaada SataraMH Private Limited



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1. OBJECTIVE AND SCOPE

The corporate world is full of documents. It includes documents in physical as well as in electronic form. Hence a policy is required on preservation of such documents which would guide employees and ensure proper maintenance and safety of documents and records, for both statutory compliance and internal purposes, while at the same time, avoiding superfluous inventory of documents by appropriately providing for their safe disposal/ destruction/ archival, as the case may be. The Company, therefore, makes this Policy on the Preservation and Archival of Documents (“Policy”), in pursuance to Regulation 9 read with Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”), on preservation of the documents inter alia to aid the employees in handling the documents efficiently either in physical form or in electronic form. It covers the various aspects on preservation of the documents, archival of the same and safe disposal/destruction of the documents.

The Board of Directors of the Company has approved this Policy at its meeting held on January 31, 2022, to be adopted by the Company with effect from listing of any of the securities of the Company.

2. DEFINITIONS

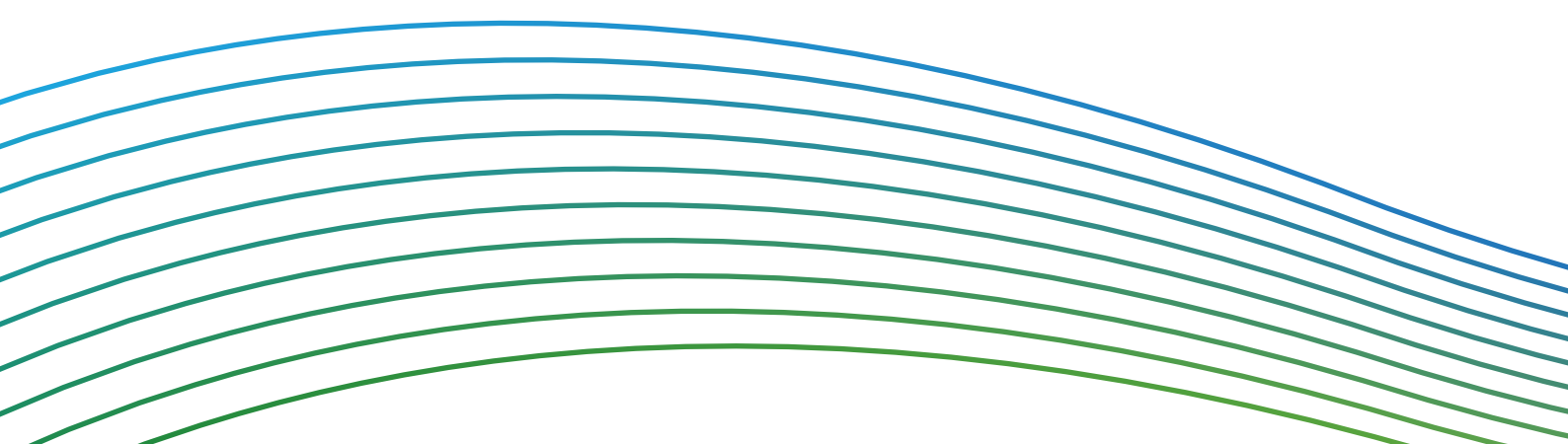
- 2.1. “Act” means the Companies Act, 2013.
- 2.2. “Applicable Law” means any law, rules, circulars, guidelines or standards binding on the Company, under which the preservation of the Documents has been prescribed.
- 2.3. “Authorised Person” means the functional head of the concerned department or any other person duly authorised by the Board or any of the Managing Director(s) of the Company.
- 2.4. “Board” means the Board of Directors of the Company.
- 2.5. “Company” means Avaada SataraMH Private Limited.
- 2.6. “CS” means the Company Secretary of the Company.
- 2.7. “Document(s)” refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record/s maintained by the Company, 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 / print form or in Electronic Form and does not include multiple or identical copies.
- 2.8. “Electronic Record(s)” means the electronic record as defined under clause (t) of sub- section (1) of section 2 of the Information Technology Act, 2000.
- 2.9. “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 access to it.
- 2.10 “HOCD” means head of the concerned department
- 2.11. “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed, other than as permitted by this Policy.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

3. CLASSIFICATION

- 3.1. The preservation of Documents shall be done in the following manner:
- 3.1.1. **Class I Documents:** Documents which are to be Preserved permanently, either under Applicable Law or as determined by the Authorised Person.
 - 3.1.2. **Class II Documents:** Where a Document is required to be preserved for not less than eight years after the completion of the relevant transactions under Applicable Law, then for such period. Where a Document is required to be preserved for a period less than eight years as per Applicable Law, then for such period required by Applicable Law.
- List of Class I Documents and Class II Documents are attached as Annexure A
- 3.1.3. **Other Documents:** Documents other than Class I or Class II Documents for such period as may be prescribed under any statute or regulation as applicable to the Company.
 - 3.1.4. With respect to disclosures made by the Company under Regulation 30(8) of the Regulations, such disclosures shall be hosted and accessible on the Company's website for a minimum period of five years.
- 3.2. As a general principle, a Document should be permanently Preserved, even beyond the requirements of Applicable Law, where the Document has a particular legal, historical or business significance and is of such nature that it should be available to the Company for the long term.
- 3.3. Each employee shall abide by the Policy. Each Authorised Person shall guide the employees in his department and ensure that they identify and classify Documents and take appropriate action with regard to their preservation in accordance with this Policy.
- 3.4. In case of any doubt as to the appropriate classification, the employee shall refer the same to the relevant Authorised Person. In case of ambiguity as to the classification, the Authorised Person may refer the matter to the HOCD for final decision of the classification of the relevant Document.
- 3.5. It is further clarified that the Documents may be subject to periodic internal review and may accordingly be reclassified appropriately by the Authorised Person.
- 3.6. As a general rule, a particular Document shall be considered to belong to a particular department if it originated in such department or if it comes under the scope of responsibility of the head of department of such department. In case a Document is part of two or more departments or if there is ambiguity as to the department to which a particular Document belongs, the matter may be referred to the HOCD, whose decision shall be final.

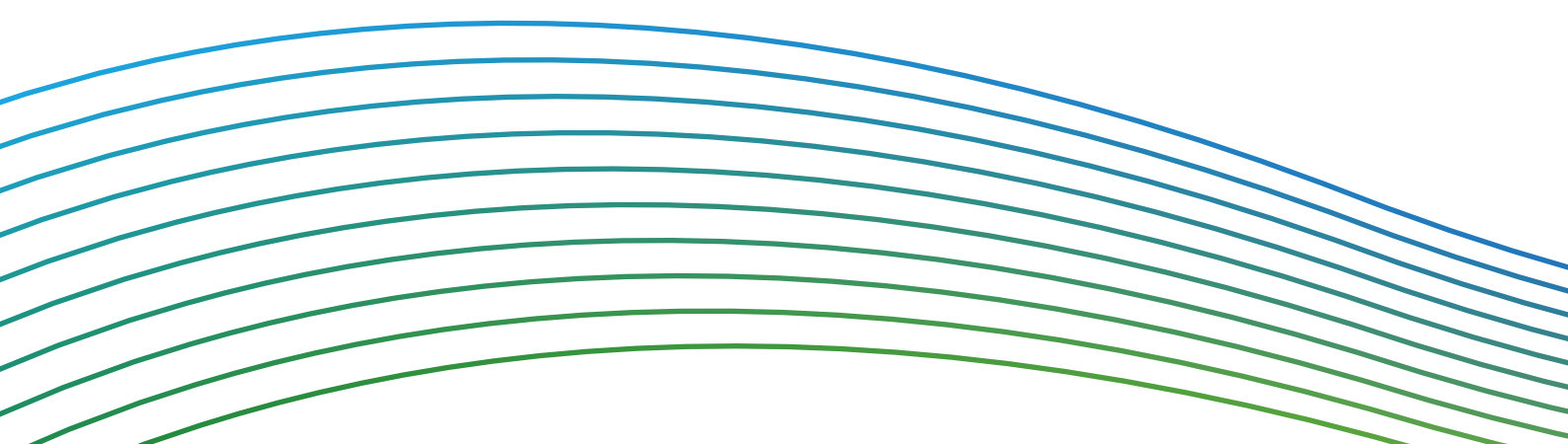
Each Authorised Person shall be required to preserve the document pertaining to its department. The CS shall be responsible for the overall compliance of the Policy. Each Authorised Person and HOCD shall act under this Policy in consultation with the CS and shall perform all acts and extend all cooperation to the CS to enable him/ her to ensure compliance with the Policy and the Regulations.



4. MODES OF PRESERVATION/STORAGE

- 4.1. The Documents may be preserved in:
 - 4.1.1. Physical form or
 - 4.1.2. Electronic form.
- 4.2. 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, other than disposal of Documents as permitted under this Policy.
- 4.3. The preserved Documents must be accessible at all reasonable times. Access shall be controlled by the Authorised Persons, so as to ensure integrity of the Documents and prohibit unauthorized access.

5. CUSTODY OF THE DOCUMENTS

- 5.1 HOCD of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.
 - 5.2 Subject to the Applicable Law, the custody of the Documents shall be with the relevant Authorised Person. Where the Authorised Person tenders his resignation or is transferred from one location of the Company to another or is otherwise no longer employed with the Company, such person shall hand over all the relevant Documents, lock and key, access control or password, or company disc, other storage devices or such other Documents and devices in his possession under the Policy to the new HOCD. Information of the cessation or transfer of the Authorised Person shall also be intimated to the CS and information technology department of the Company.
 - 5.3 The Authorised Person will co-ordinate with the IT Department of the Company to ensure Preservation of Documents in electronic form, as appropriate.
 - 5.4 Notwithstanding anything contained elsewhere in the Policy but subject to the requirements of Applicable Law, the Authorised Person may (subject to final approval from the HOCD) permit other means of storage including usage of a third party service provider or a centralized system of storage for the Preservation of Documents.
 - 5.5 Notwithstanding anything contained above, where any Documents are required to be maintained at the registered office of the Company, then they shall be maintained at such place.
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6. AUTHORITY TO MAKE ALTERATIONS TO THE POLICY

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Act and Regulations. The CS, being the Compliance Officer, is also authorized to make amendments in this Policy, where there is any statutory changes necessitating the amendment in the Policy.

7. DESTRUCTION OF DOCUMENTS

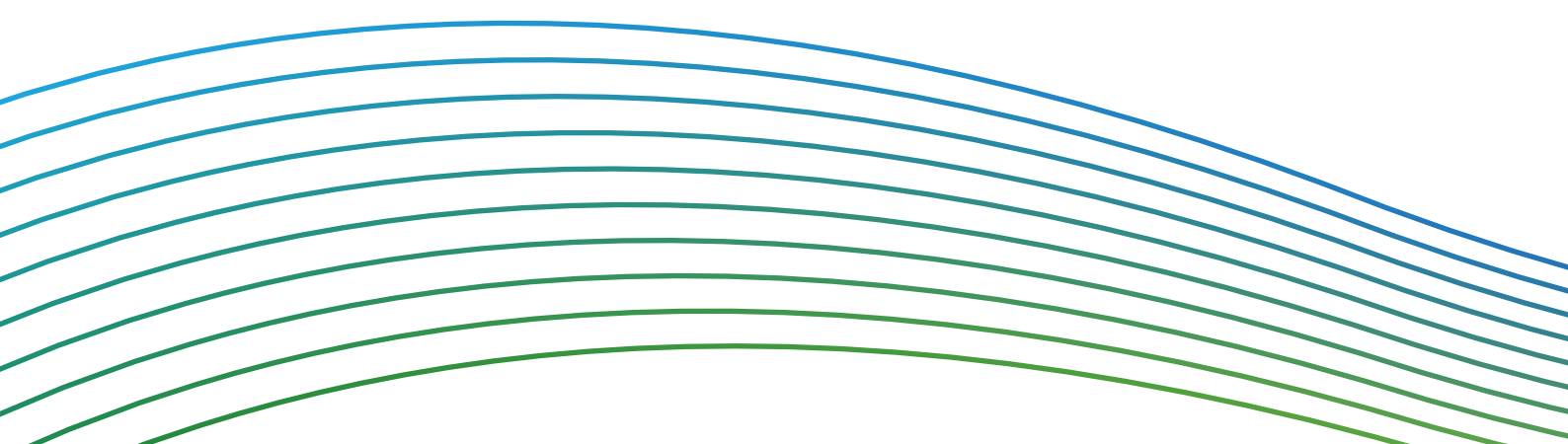
- 7.1 Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both physical and electronic Documents.
- 7.2 Documents shall be disposed as follows:
 - 7.2.1 Class I Documents cannot be disposed without the approval of the Board.
 - 7.2.2 Class II Documents may be disposed off after the time prescribed under applicable Law has lapsed, with the prior approval of the Authorised Person.
- 7.3 The Authorised Person shall exercise due diligence while destroying any Documents, including seeking confirmation from other relevant departments or external consultants, to the extent necessary.
- 7.4 A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the Authorised Person.
- 7.5 The format of the register has to be in accordance with Annexure B.
- 7.6 The functional head of the IT department shall make appropriate provision for back up for Electronic Records.
- 7.7 The relevant Authorised Person shall forthwith inform the CS and the HOCD of any damage or inadvertent destruction of any Document.

8. ARCHIVING OF DOCUMENTS WHICH ARE ON **THE COMPANY'S WEBSITE**

Recognizing the need to ensure the preservation and availability of the Documents of the Company after their required preservation period as set out under the Regulations and hereunder, for any legal, administrative, and historical purposes, the Company adopts the following archival policy in respect of Documents which are hosted on the website of the Company:-

- 8.1 All Documents generated, disclosed or received by the Company, on its website are the properties of the Company and constitute Archival Material.

Archival Material of the Company shall not be destroyed or purged without the approval of the Authorised Person. Provided that this shall not apply in case of an accidental deletion, or deletion due to any system flaw, virus, or any other deletion, inaccessibility or loss due to any reason other than deliberate and determinate deletion.

- 8.2 Archiving of the Documents to be submitted to the stock exchange, in terms of the Regulations, shall be done after the lapse of the preservation period of 5 years, as per the archival policy.
- 8.3 For the Documents to be submitted to the stock exchange to comply with disclosure norms as required by any other Applicable Law, the Documents are to be archived after the lapse of the specified/required time period.
- 8.4 Material so selected for Preservation shall be sent to the Company archives.
- 8.5 The Authorised Person will be responsible for deciding how long Archival Material is to be retained after the minimum period of five years, if the law or this Policy does not specify any time period.
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9. MISCELLANEOUS

9.1 Maintenance of Documents in Indexed form

9.1.1 For ease of record reference, the Documents may be preserved in an indexed form.

9.1.2 The index may be kept in physical form and/or in Electronic Form.

9.2 Conversion of the form in which the Documents are preserved

The physical Documents preserved may be converted, whenever required or felt necessary, into Electronic Form to ensure ease in maintenance of Documents and efficient utilization of space. This will be done after obtaining prior approval of the Authorised Person.

9.3 Authenticity

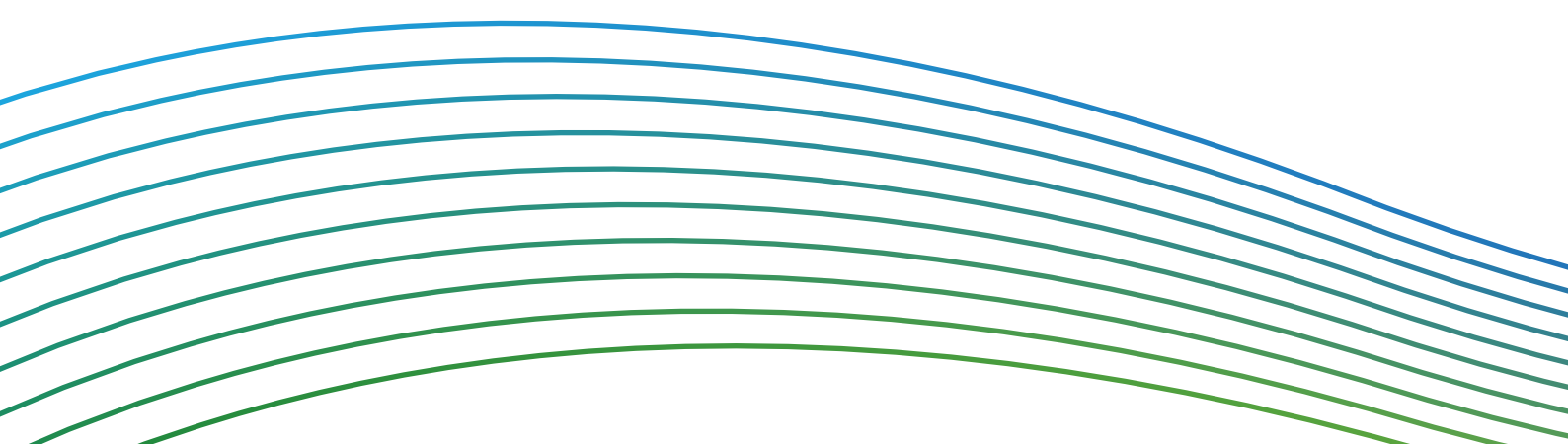
Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form shall be considered for every purpose.

9.4 Uploading on the Website

A copy of this Policy shall be uploaded on the website of the Company.

9.5 Interpretation

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule or Regulation, the law, rule or Regulation will take precedence over this Policy until such time as this Policy is changed to conform to the law, rule or Regulation.



ANNEXURE A

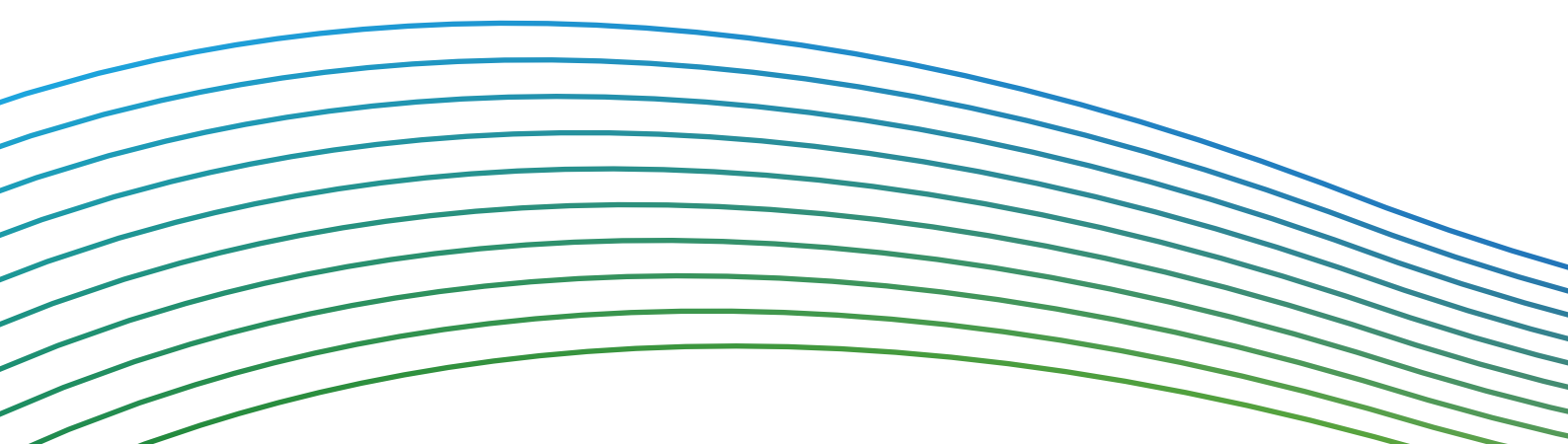
Class I - Documents

i) Records as per Companies Act

- The Memorandum and Articles of the Company
- Certificate of Incorporation
- Affidavit from the subscribers to the Memorandum and from persons named as the First Directors
- Register and Index of Members (MGT-1)
- Listing Agreement with Stock Exchanges
- Forms filed with Registrar of Companies (ROC)
- Register of Renewed and Duplicate Share Certificate (SH-2)
- Books and Documents relating to the issue of share certificates, including the blank forms of share certificates
- Annual Return
- The Foreign Register of Members
- Register of Charges (CHG-7)
- Minutes Book of General Meeting, Board Meeting and Committee Meeting.
- Register of particulars of loans and guarantee given, securities provided & acquisition of securities made by the Company(MBP-2)
- Register of Directors, Managing Director, Manager and Secretary
- Register of Director's Shareholding
- Register of transfer of shares
- Register of transmission of shares
- Register of Investments not held in its own name by the Company (MBP-3)
- Register of Contracts with Related Party and Contracts and Bodies etc. in which Directors are interested (MBP-4)
- Various licenses and permits/approvals received by the Company wrt the business of the Company.

ii) Accounts and Finance Records

- Annual Audited Financial Statements



Class II Documents

- Instrument Creating a Charge or modification thereon (8 years from the date of satisfaction of charge)
- Instrument Creating a Charge or modification thereon (8 years from the date of satisfaction of charge)
- Resolutions passed by Circulation
- Register of Debenture Holders or any other security holders (8 years from the date of redemption of debentures or securities) (MGT-2)
- Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)
- Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)
- All notices pertaining to disclosure of interest of directors (MBP-1) for a period of 8 years from the end of the financial year to which it relates)
- All certificates surrendered to a company (3 years from date of surrender)
- Register of deposits (not less than 8 years from the date of last entry)
- Instrument creating a charge or modification (8 years from date of satisfaction of charge)
- The postal ballot and all other papers relating to postal ballot including voting by electronic means (as long as they remain current or for 8 financial years), whichever is later.
- All books and documents relating to the issue of share certificates, including the blank forms of share certificates not less than 30 years
- Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode (8 Financial years) (SS-1)
- Copies of Notices, Agenda, Notes on Agenda and papers related to Board Meeting. (8 Financial Years) (SS-1)
- Disclosures under SEBI – Substantial Acquisition of Shares and Takeover Regulations, Prohibition of Insider Trading Regulations
- Office copies of Notices, Scrutinizer’s Report, and related papers (as long as they remain current or for 8 financial years), whichever later (SS-2)

ii). Accounts and Finance Records

- Books of Accounts, Ledgers and Vouchers
- Investment Records
- Engagement Letters from Auditors

iii). Tax Records

- Income Tax Returns, GST Return, etc
- Documents, Challans and other details/correspondence related to Income Tax, GST, etc.

ANNEXURE B

The list of the register of Documents disposed/destroyed –

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF APPLICABLE LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON
NIL		

THANK YOU



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