

POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

HRS ALUGLAZE LIMITED

(Formerly known as HRS Aluglaze Private Limited)

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1. Background

The Board of Directors ("The Board") 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 other applicable provisions (including any statutory enactments/amendments thereof), adopted the policy for preservation and Archival of documents ("Policy") with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

In accordance with the above Regulation 9, and the provisions of the Companies Act, 2013, and other applicable provisions of law the Company has framed the Policy in line with the existing provisions of the SEBI Listing Regulations and the Companies Act, 2013.

This policy can be modified and amended if required from time to time with the approval of Board of Directors only.

2. Objective of the Policy

The Objective of this policy is to classify the documents, records, and registers of the Company whether in physical or electronic mode, which are required:

- (i) to be preserved permanently
- (ii) to be preserved for a period of not less 8 years

The preservation of Documents is important in order to ensure immediate access to the records, its retrieval and authentication

3. Definitions

"Applicable Law" means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA), The Institute of Company Secretaries of India (ICSI) and other professional bodies under which the preservation of documents has been prescribed.

"Books of Accounts" includes records maintained in respect of –

- i. all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place
- ii. All sales and purchases of goods and services by the Company
- iii. The assets and liabilities of the Company; and iv. The items of cost as may be prescribed under section 148 of the Act in case the Company belongs to any class of companies specified under that section.

“Document(s)” refers to papers, notes, agreements, notices, advertisement, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other records, required or in order to comply with the requirements of any applicable Law, whether issued sent, the time being in, or otherwise maintained on paper or in electronic form received or kept in pursuance of the act or any other Law for and does not include multiple or identical copies.

“Electronic Record(s)” means the electronic records as defined under clause (t) of Sub-section (1) of section 2 of the Information Technology Act, 2000

“Electronic Form” means on any electronic device such as computer, laptop, compact disc, floppydisc, 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 Company has control over access to it.

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

“Preservation” means, maintenance in usable format and to prevent from being altered, damaged or destroyed.

4. Effective date

The policy will be effective from date of listing of equity shares of the company on Stock Exchange.

5. Applicability and Modes of Preservation:

This Policy applies to all documents & records maintained by the Company in physical form or electronically stored in computer or in any other electronic devices or transcribed information of any type whether expressed in ordinary or machine language at all locations of the Company in or outside India

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

6. Preservation of Documents

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time to time.

The Policy classifies the documents & records in the following two categories:

- a. Documents & records, Illustrative list mentioned in **Annexure A**, whose preservation shall be permanent in nature; and
- b. Documents & records, Illustrative list mentioned in **Annexure B**, which need to be preserved for not less than eight years after completion of the relevant transaction(s):

7. Information / Documents on the website of the Company

The information and/or documents uploaded on the website of the Company i.e. WWW.hrsaluglaze.com and shall be maintained for a period of five years from the date of upload.

Thereafter, the information and/or documents can be removed from the website.

The backup of the information and /or documents which are removed from website may be preserved for a period of 1 year and thereafter can be deleted/disposed-off permanently from the server.

8. Mode of Maintenance

The Company shall maintain these records either in physical or in electronic mode. The applicable provisions of law, rules and regulation with regards to electronic maintenance of records shall be adhered to. All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under various rules and regulations.

9. 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 of them.

10. Disposal and Destruction of Records

After expiry of minimum period, the documents may be disposed-off by the respective function/department. The respective owner responsible for destruction shall ensure that documents & records are disposed-off in an effective manner that leaves no possibility for reconstruction of the records and information contained therein.

Appropriate methods for destroying/disposing of paper records viz. incinerating, shredding, pulping etc. be used. Electronic data contained on servers and hard drives shall be deleted and overwritten.

The documents/records/information which require prior approval of Board or any authority under the Act or SEBI Regulations or any other law, for time being in force, for their disposal, shall not be disposed-off until such prior approval has been obtained from such authority or Board.

11. Policy Review

The policy shall be periodically reviewed and brought in conformity with statutory and regulatory requirements, as and when required.

12. Back Up of Data

In the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Company has made appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability. The Company ensures that the digital collections and technical infrastructure required to manage and access them can be restored in the event of an emergency.

13. Interpretation

In any circumstance where the provisions of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the relevant law, rule, regulation or standard will take precedence over this Policy until such time as this Policy is changed to conform to the said law, rule, regulation or standard.

Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.

Annexure A**Illustrative list of documents & records whose preservation shall be permanent in nature**

- a. Memorandum of Association and Articles of Association;
- b. Certificate of Incorporation;
- c. Minutes Books of Board Meetings, General Meetings and Committees' Meetings;
- d. Statutory Registers, maintained under the Companies Act, 2013, as amended from time to time;
- e. Licenses and key approvals from the Statutory Authorities
- f. Annual Reports;
- g. Policies, Charters and Codes of the Company;
- h. Property documents owned by Company;
- i. Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded;
- j. Copyrights, Trademarks, Industrial designs and Patents etc., if any, owned by Company;
- k. All other documents which are required to be preserved permanently in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars, and notifications etc. as may be applicable to the Company from time to time.

All modifications, amendments, additions, deletions to the above documents shall also be preserved permanently by the Company.

Annexure B**Illustrative list of documents & records to be preserved for not less than eight years after completion of the relevant transaction(s):**

- a. Books of accounts and tax records viz. documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 (eight) years from end of the relevant assessment year or till the disposal of the appeal against any demand by the highest authority, whichever is later;
- b. Attendance Registers, Notices, Scrutinizer's Report, Agenda, Notes to Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings;
- c. Disclosures of Interest received from Directors;
- d. Copy of filings and returns that are not permanent in nature, under the provisions of the Companies Act 2013 / SEBI Regulations / other laws;
- e. Employment / Personnel record in case of employees of the Company;
- f. All Press Releases and publicly filed documents;
- g. Legal Memoranda and Opinions;
- h. All contracts shall be retained for a period of 8 (eight) Years after the expiry of the term of the contract unless such contract has been a subject matter of dispute in which case the contract and all other related communications/documents shall be preserved for a period of 8 (eight) years after such dispute has been finally adjudicated and the order / judgment cannot be superseded or has not been appealed against within the limitation period;
- i. In case any document is required for the purpose of any legal dispute, litigation, proceedings etc. such records shall not be disposed-off and shall be maintained for a minimum period of 8 years from the date of final conclusion of such legal dispute, litigation or proceedings etc;
- j. All other documents which are required to be preserved for not less than 8 years in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars, and notifications etc. as may be applicable to the Company from time to time.