

ADVIK CAPITAL LIMITED

CIN: L65100DL1985PLC022505

**PRESERVATION OF
DOCUMENTS
AND
ARCHIVAL POLICY**

I. POLICY STATEMENT

Policy for Preservation of Documents and Archival Policy (as defined below) with the objective of classifying the various information and documents filed with the Registrar of Companies, stock exchange(s), record and register for the purpose of maintenance and preservation of such information and documents filed with the stock exchanges, identification of custodian to retain and preserve such records/ information/ documents along with the mode in which such records/ information/ documents will be maintained.

II. SCOPE AND OBJECTIVE

This Policy provides a framework for ensuring of preservation of documents/ records maintained by the management/ employees of the Company as per the respective statutory/ non statutory requirements either in (i) Physical mode; or (ii) Electronic Mode.

This Policy covers records retained at the Company's own location and/or at the locations of the Registrars and Share Transfer Agents appointed by the Company.

The objective of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved for the time limit as per the statutory requirements and to ensure that the records of the Company which are no longer needed or which are not required to be maintained as per the statutory requirements or are of no value are discarded in proper manner, so that no one can have access to such discarded documents, after following the due process for discarding the documents.

This Policy also outline the framework for all the employees and top management to understand the roles and responsibilities towards retaining and preserving the documents and records. This Policy shall also outline the custodian of the documents and records and detail process to get the access of such documents.

All documents of the Company shall be maintained in compliance with the requirements of the Applicable Laws, including the SEBI Listing Regulations. The preservation of the documents shall be as per the periodicity stated in the guidance manual to the Policy.

This Policy shall provide the guidelines to classify the documents, records and registers of the Company which are required:

- i. To be preserved permanently; and
- ii. To be preserved for a period of not less than 8 years.

III. COMPLIANCE OFFICER

The Company shall, from time to time, designate an employee of sufficient seniority, competence and independence as the Compliance Officer to ensure compliance with the provisions of this Policy and the same shall be notified to the Designated Persons. The Company Secretary/CFO has been designated as the Compliance Officer. All reports, complaints, doubts or concerns in relation to matters covered by this Policy should be raised by the relevant Designated Persons to the Compliance Officer.

IV. DEFINITIONS

“Act” means the Companies Act, 2013

“Applicable laws” means Securities Laws, Listing Regulations and other laws and statutes applicable to the Company.

“Board” means board of directors of the Company as constituted from time to time.

“Company” means Advik Capital Limited

“Documents” means all the business records like registers, records, papers, agreements, notices, advertisements, requisitions, order, declarations, forms, show cause notice, minutes, replies, or any other records and registers to be maintained as per the statutory requirement or in order to comply with the requirements of any applicable law, whether required to be submitted to concerned authority or sent to government department or any associates, or otherwise, and records maintained in the electronic form received or kept pursuant to the Companies Act, 2013, or under any other applicable laws for time being in force or otherwise, maintained in physical or in electronic form.

“Maintenance” means keeping documents, either physically or in electronic form.

“Policy” means this Policy for Preservation of Documents and Archival Policy

“Preservation” means to keep the documents under the custody of authorised person, which shall prevent the documents from being altered, damaged or destroyed.

“SEBI Listing Regulations” means SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended

“Year” means financial year.

Any Words and expressions used and not defined in this Policy but defined in the, SEBI Listing Regulations, the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation as the context may so require.

V. Framework

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) and various provisions of the Companies Act, 2013.

Regulation 9 of the SEBI Listing Regulations mandates that a listed entity shall have a policy for preservation of documents approved by its board of directors, classifying them in at least two categories as follows:

- (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.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode. Further, Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information, which have 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.

Besides the above, as per the applicable provisions of the Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly, this policy has been framed, keeping in view particularly the requirements of the SEBI Listing Regulations and the provisions of the Companies Act, 2013.

VI. CLASSIFICATION OF DOCUMENTS

For the purpose of the Policy, the documents of the Company are classified as follows:

- (i) Documents which need to be preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company.

- (ii) Documents with a preservation period of not less than the time period stipulated in the SEBI Listing Regulations and other laws and statutes applicable to the Company from time to time after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications amendments, additions or deletions in the documents shall also be preserved for the said period.

VII. PRESERVATIONPOLICY

The following documents required to be prepared and maintained under the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be preserved for such period as mentioned against each item in the table.

Annexure 1 of this policy contains the details of Documents whose preservation shall be permanent in nature, subject to the modifications, amendments, additions or deletions or any changes made there infrom time to time. Provided that the Company shall also preserve all such modifications, amendments, additions or deletions in the Documents permanently.

Annexure 2 of this policy contain the details of documents whose preservation shall be temporary in nature and shall be maintained in the following manner:

- a) All such documents having preservation period of 8 (eight) years or period as per applicable laws, shall be preserved for such period as prescribed under the applicable laws but not less than 8 (eight) years.
- b) All other documents for which the period of preservation is not prescribed under any laws shall be preserved for a minimum period of 8 (eight) years or any such specific period as the Company deems necessary, as may be mentioned against each item.

VIII. MODES OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

IX. CUSTODY OF THE DOCUMENTS:

Documents which are required to be maintained and preserved by the respective head of the departments are provided in the table entailed below. Following is the list of authorised persons who shall act as the custodian of the documents:

S. N.	Documents	Authorised person / Custodian
1	Legal Files/ Documents	Head - Legal department
2	Secretarial related documents	Head – Secretarial Department
3	Tax / Accounting Records	Chief Financial Officer
4	Employment/ Personal data of employees	Head – Human Resources department

X. ARCHIVAL POLICY

1. The registers/documents mentioned above may be destroyed in accordance with the provisions contained in the Act and the SEBI Laws after approval of the Board and in the presence of the Company Secretary and the CFO.
2. The Board shall review, at least once in every three years, the list of documents that may be destroyed.
3. The Company shall maintain a Register of Records and Documents Destroyed, containing the particulars of the documents destroyed, the year to which it pertains, mode of destruction etc., each entry in this register shall be verified by the Company Secretary and countersigned by the CFO.
4. The concerned employee shall be responsible for taking in to account the potential impact on preservation/destruction of the documents in their work area and their decision to retain/preserve/destroy documents pertaining to their area of work.

XI. EXCLUSION

Documents/records in respect of which any investigation/enquiry is pending, or in respect of which any legal proceeding is pending, or which is part of any legal dispute, are not covered under this policy.

XII. MISCELLANEOUS

1. Any words used in this policy but not defined herein shall have the same meaning ascribed to it in the Articles of Association of the Company and /or the Companies Act, 2013 or Rules made thereunder.
2. In case of any doubt, ambiguity, dispute or difference arise out of the meaning/interpretation of any word or provision in this Policy, the same shall be referred to the Committee, if formed, otherwise board and the decision of such Committee/ Board in such case shall be final.
3. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.
4. This Policy shall come into force on the date it is approved by the Board of the Company i.e with effect from January 17, 2022.

XIII. POLICY REVIEW AND AMENDMENTS

1. Company's Board will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness.
2. Company reserves the right to vary and/or amend the terms of this Policy from time to time.

XIV. DISCLOSURES

The policy shall be disclosed on the website of the Company i.e www.advikgroup.com and such other places as may be required by the Act and rules framed thereunder, Equity Listing Agreement entered into with the stock exchanges (including any statutory modification(s) or reenactment thereof) and such other laws for the time being force.

XV. DISCLAIMER

1. Given the aforementioned uncertainties, prospective or present investors are cautioned not to place undue reliance on any of the forward-looking statements in the Policy.

Annexure 1: Documents whose preservation shall be permanent in nature

S.N.	Particulars
1.	Documents and information filed with ROC for Incorporation of the Company
2.	Certificate of incorporation and certificate of change of name, (if any)
3.	Certificate for commencement of business, if any
4.	Memorandum of Association and Articles of Association (along with the amended copies)
5.	Agreements made by the Company with the Stock Exchanges and Depositories, etc.
6.	Common seal of the Company
7.	Cancelled Share certificates
8.	Licenses, Certificate and permissions obtained from any statutory authority
9.	Order from Courts and any other regulatory authorities
10.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013 and Secretarial Standards
11.	All the registers and records as per Companies Act and LODR Regulations
12.	Policies of the Company framed under the Companies Act, 2013 and various regulations from time to time.
13.	Intellectual Property Documents shall include but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs, Intellectual Property rights documents that are owned by the Company shall be retained by the Company permanently
14.	All the documents like agreements, application, stamp duty payment receipts for all the properties that are owned in the name of the Company
15.	Any other documents as may be required to be maintained in terms of applicable law(s) and preserved from time to time

Annexure 2: Documents whose preservation is not permanent in nature

S.N.	Particulars
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Annual Returns as per Companies Act, 2013
3.	Register of Deposits as per Companies Act, 2013
4.	Attendance Register of Board/General Meetings
5.	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
6.	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
7.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
8.	Copy of newspaper advertisement or publications
9.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases
10.	Compliance Reports received from any statutory authority
11.	Correspondences made with any statutory authority
12.	Register of Power of attorneys, if any
13.	Forms and returns filed with RBI/MCA or with any other statutory authority
14.	Scrutinizers report
15.	Income tax Returns/ Documents filed under Income Tax Act, 1961
16.	Books of accounts and financial statements etc.
17.	Employees Information Records
18.	Other Statutory registers and Statutory forms required to be maintained/filed.
19.	Any other important documents including tax filling and papers, project documents and any other such documents and papers.

Annexure

Document Control Section

Document Name	
Abstract	
Security Classification	
Location	

Authorization

Document Author	Document Owner	Reviewed By	Approved By

Review and Amendment Log

Version	Modification Date	Section	Amendment/ Modification/Deletion	Brief Description of Change / Review