

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL PROCESS

1. Preamble:

This policy ("Policy") of Atlanta Electricals Limited ("Company") has been prepared and adopted in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") read with SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018 and Companies Act, 2013 ("Act") read with the Companies (Amendment) Act, 2017 along with circulars issued thereunder, including any statutory modifications or re-enactments thereof for the time being in force.

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per Policy.

Regulation 9 of SEBI LODR requires the Board of Directors of the Company to formulate a policy for preservation of documents classified into two categories:

1.2.1 Documents whose preservation shall be permanent; and

1.2.2 Documents to be preserved for not less than eight years (8 years) after completion of the relevant transactions.

2. Objective:

The main objective of this policy is to ensure that all the statutory documents are preserved in Compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed, or which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

- To identify statutory records to be preserved.
- To identify records to be maintained either for a period of eight (8) years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form.
- To help employees understanding their obligations in retaining and preserving the documents and records.
- Effective corporate governance and risk management.
- Effective information management to support the work of the administrations and provision of continued access to it at times when needed.
- Systematic disposal/destruction of Company's non-current records that have outlived their administrative usefulness.

- Identification of the Company's records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company's Archives.

3. Applicability:

This Policy shall come into force from the date of approval by the Board of the Company.

This Policy is applicable to all documents maintained in physical and electronic mode by the Company.

The documents not 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.

4. Definitions

In this Policy unless the context otherwise requires,

1. Act

"Act" means the Companies Act, 2013 or the Securities and Exchange Board of India Act, 1992 or any statutory modification or re-enactment thereof and includes any Rules and Regulations framed thereunder, as the case may be in respect to the reference made in the provisions under this Policy.

2. Articles:

"Articles" means the Articles of Association of the Company, as modified from time to time.

3. Board:

"Board" means the collective body of the Directors of the Company;

4. Committees:

"Committees" means Committees of Board constituted by virtue of Directions under Companies Act 2013, and Listing Regulations or by any other statutory body for the time being in force.

5. Authorized Person:

"Authorized Person" means any person duly authorized by the Board, Managing Director or any Executive Director of the Company.

6. Key Managerial Personnel

Pursuant to the provisions of the Companies Act, 2013, the Company, shall have the following whole-time Key Managerial Personnel, -

- i) Managing Director, or Chief Executive Officer or manager and in their absence, a whole-time director.
- ii) Company secretary; and
- iii) Chief Financial Officer.

7. Books of account:

“Books of account” means as defined in the Act.

8. Current Documents

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

9. Document

“Document” means all papers, files, books of account, certificate, summons, notice, license, requisition, order, declaration, confirmation, evidentiary record, electronic record, electronic mail, instrument, statements, agreements, deeds, permissions, press release, returns, official publication, report, policies, record, form, register, voucher, ledger, minute book, Floppies, CDs, DVDs, Electronic Storage Devices, etc whether issued, sent 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 mode etc;

10. Electronic Mail

“Electronic mail” means the message sent, received or forwarded in digital form using any electronic communication mechanism that the message so sent, received or forwarded is storable and retrievable;

11. Electronic mode

“Electronic mode” means data sent, received or forwarded is storable and retrievable using electronic medium.

12. Electronic Record:

“Electronic record” means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000;

13. Maintenance:

“Maintenance” means keeping document(s), either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such documents.

14. Meeting:

“Meeting” means a meeting, duly convened and constituted, of the Board or any committee thereof or of the Members of the Company;

15. Member:

“Member” means any person who agrees, either by subscribing to the Memorandum of Association of the company or by applying in writing, to become a member of the company and whose name is entered either in the Register of Members of the Company or in the records of the Depository as a beneficial owner in respect of the equity shares of the Company held by him.

16. Preservation:

“Preservation” means to keep in good order; to prevent from being damaged or destroyed.

17. Record:

“Record” means documentary evidence of past events or transactions.

18. Register:

“Register” means a register maintained under the Act and includes registers referred to in this Policy.

19. Senior Management:

“Senior Management” shall mean officers/personnel of the listed entity who are members of its core management team excluding board of directors and normally this shall comprise all members of management one level below the chief executive officer/managing director/whole time director (including chief executive officer/, in case they are not part of the board) and shall specifically include company secretary and chief financial officer.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

5. Classification of Documents:

Documents of the Company which are to be preserved are classified into the following categories:

1. Documents which shall be preserved be permanent.
2. Documents which shall be preserved for a period of not less than 8 years from the date of completion of relevant transactions.

Detailed classification of documents to be preserved

Serial No.	Document Category	Document Type	Preservation requirement	Under the custody of
i.	Corporate/ Organizational	<ul style="list-style-type: none"> • Certificate of Incorporation. • Memorandum of Association. • Articles of Association; 	Permanent	Company Secretary
		<ul style="list-style-type: none"> • Statutory Licenses, Registrations and Permits; 	Permanent	MR
		<ul style="list-style-type: none"> • Permanent Account Number Card. 	Permanent	CFO
ii.	Directors/ Key Managerial Personnel/Senior Management	<ul style="list-style-type: none"> • Consent to act as a Director (Form DIR-2); • Notice of disclosure of interests (Form MBP-1); • Intimation of disqualification, if any (Form DIR-8); • Disclosures made under SEBI (Prohibition of Insider Trading) Regulation, 2015; • Resignation Letters; • Service Agreements/ Letter of Appointment; • Correspondences with the Directors 	Up to eight years from the date of resignation/cessation of the concerned person	Company Secretary
iii.	Finance & Accounting	<ul style="list-style-type: none"> • Audited Financial Statements and related documents; • Auditors Reports. 	Permanent	Company Secretary or CFO
		<ul style="list-style-type: none"> • Unaudited Financial Statements and related documents; 	Up to eight years from the date of document	CFO

		<ul style="list-style-type: none"> • Books of accounts and vouchers; • Management Letters; • Investment Statements; • Cost Records; • Bank Statements • Sanction Letters and agreements with Banks and financial institution; • Forex transactions; • Income tax Returns; • Tax deduction records; • Records relating to Customs; • Records relating to payment of gratuity; • Details of Related Party Transactions. • Remittance Register • Fixed Asset Register 		
iv.	Share & Secretarial	<ul style="list-style-type: none"> • Annual Reports. • Listing Agreement with the Stock Exchange(s). • Tripartite Agreement with the Depositories and the Registrar and Share Transfer Agent (RTA) of the Company. • Agreement with the RTA. • Prospectus. • Documents related to declaration of Interim and Final Dividend. • General Meeting Minute Book. • Board Meeting/Committee Minute Book. • Resolutions passed by the Board/Committee in Circulation and related documents. • Statutory Registers. • Company Policies/Charters/Bye laws. • Secretarial Audit Report and the related documents. • Annual Return and related documents. 	Permanent	Company Secretary

		<ul style="list-style-type: none"> • Forms (including e-forms), returns and documents including agreements, receipts, undertakings, affidavits with the Registrar of Companies, Regional Director, Ministry of Corporate Affairs, Government of India, Central government and/or any other Statutory Authority(ies) 		
		<ul style="list-style-type: none"> • Investor Grievance correspondences. • Correspondences with Statutory Authority(ies); • Records from the RTA. • General Meeting Notices. • Documents relating to Postal Ballots. • Attendance Register. • Leave Register. • Board Meeting/Committee Meeting Notices. • Board Meeting/Committee Meeting Agenda Papers. • Board Presentations. • Certified Extracts from the Minute Book. • Instrument creating a charge including modification and satisfaction thereof. • Newspaper publications 	Up to eight years from the date of document	Company Secretary
v.	Provident Fund	<ul style="list-style-type: none"> • Records relating to Employees' Provident Fund. • Accounts & Returns submitted to Regional Provident Fund Office. • Electronic Challan Receipts (ECR). 	Eight years	Head- Human Resources
vi.	Legal	<ul style="list-style-type: none"> • Property Records. • Documents related to the Acquisition and Sale of Property; • Records related to development of intellectual property 	Permanent or as per requirement of law	MR

		<p>including Patent, Trademark, Copyright or Trade Secret.</p> <ul style="list-style-type: none"> • Records of efforts not to Infringe any Patent, Trademark, Copyright or Trade Secret. • Lease and Sale Agreements, Rent Agreements. • Non-Disclosure Agreements. • Contracts, Agreements (unless specifically addressed elsewhere in this policy), Deeds, Licenses. • Documents related to past/ongoing litigations. 		
vii.	Human Resource	<ul style="list-style-type: none"> • Official files of present employees. • Official files of ex-employees. • Payroll records. • ESOP Documents 	Eight years	Head- Human Resources
viii.	Insurance	<ul style="list-style-type: none"> • Insurance policies. • Documents relating to Insurance claims, settled and pending. 	Eight years	CFO
ix.	General	<p>a) Press Releases.</p> <ul style="list-style-type: none"> • Documents & Agreements with Media Company, PR Agency. 	Eight years	Marketing team

6. Archival process for the documents:

The disclosures made to the Stock Exchanges under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be hosted on the website (●) of the Company for a period of five years from the date of its disclosure. Disclosed Information which was over five years old will be archived as per the directions of the Board. Anyone intending to review that Disclosed Information may write to Compliance Officer of the Company. Thereafter the said records shall not be destroyed or purged without requisite permission of the respective functional heads who are authorized to preserve such documents.

The documents and records may be archived in physical and/or electronic mode as the Board of Directors of the Company may deem fit.

The documents and records archived in electronic form shall be backed up automatically on a periodic basis.

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute shall be maintained at the corporate office of the Company or at any other place as may be approved by the Board, from time to time.

7. Destruction/Disposal process of Documents:

- a) 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.
- b) The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice.
- c) The documents mentioned in this Policy, kept by the Company, may be destroyed after the expiry of the minimum retention period. However, in the case of pending matters/ litigation/ disputes, the documents shall be preserved till the resolution of pending matter/ litigation/ dispute. 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.
- d) The entries in the register shall be authenticated by the Authorised Person(s).

8. Review of Policy:

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for approval and noting at a meeting of the Board.

In the event of any conflict between the provisions of this Policy and of the Act or regulations or any other statutory enactments, the provisions of such Act or regulations or statutory enactments would prevail over the Policy and the provisions in the policy would be modified in due course to make it consistent with law.

9. Amendment:

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

If there is any inconsistency between the terms of the Policy and the Listing Regulations, the provisions of the Listing Regulations shall prevail. Any amendments to the Listing Regulations shall mutatis mutandis be deemed to have been incorporated in this Policy.