

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF ARCHIDPLY INDUSTRIES LIMITED

1. Introduction

In accordance with the provisions of Regulation 9 read with Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, all listed companies are required to formulate a policy for preservation of documents and archival process thereof.

This Policy has been reviewed and updated by the Board of Directors of the Company at its Meeting held on 14.02.2022 and shall be effective from the date the Company is listed on BSE Limited and National Stock Exchange of India Ltd.

2. Definitions –

- 2.1 "Act" means the Companies Act, 2013 including any Rules, Regulations as may be amended from time to time.
- 2.2 "Applicable Law" means any law, rules, circulars, guidelines or standards under which disclosure of Events or Information on the website has been prescribed.
- 2.3 "Archived documents" means details of Events or Information (defined hereinbelow) as placed or maintained in the archived folder.
- 2.4 "Authorised Person" means the person designated as the Company Secretary of the Company under Section 2(24) and Section 205 of the Act, or any other person as may be decided by the Board or Managing Director from time to time.
- 2.5 "Board" means the Board of Directors of the Company or any Committee of the Board constituted thereof.
- 2.6 "Company" means Archidply Industries Limited.
- 2.7 "Documents" shall mean all papers, records, files, books of account, summons, notice, license, requisition, order, declaration, confirmation, evidentiary record, tapes, CDs, DVDs, electronic record, electronic mail, instrument, statements, agreements, deeds, permissions, press release, returns, official publication, report, policies, record, form,

register, voucher, minute book, storage devices etc., whether issued, sent or kept in pursuance of the Act or under any law or regulation for the time being in force or otherwise, maintained on paper or in electronic mode;

- 2.8 "Events or Information" refers to the the information/ events that are required to disclose on the website of the Company in terms of Regulation 30(8) of the Regulations and other Applicable Law.
- 2.9 "Policy" shall mean "Policy on Preservation and Archival of documents".
- 2.10 "Regulations" means the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

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

3. Manner And Place of Preservation/ Maintenance

- 3.1 The records shall be preserved/ maintained or archived at the Registered Office or server of the Company, unless the applicable statutes permits it to be maintained at any other place, as long as the location of each records can be determined easily and retrievable within a reasonable amount of time.
- 3.2 Records should be stored and disposed of securely and in such a way that confidentiality and privacy of non-public documents are maintained.

4. Coverage

This policy covers archival of all Events or Information which has been disclosed to Stock Exchange(s) and hosted on the website of the Company in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Applicable Laws.

5. Responsibility to review the website and Archived documents

In accordance with the provisions of Regulation 46 (3), the Authorised Person shall ensure to update any change in the content of the website within two working days of such change. The Authorized person of the Company shall be responsible for periodic and ongoing review of the contents of the website and keep the information up to date.

The contents with respect to Events or Information as disclosed under Regulation 30(8) of the Regulations would be hosted on the website of the Company for a period of 5 years and thereafter moved to the archived folder.

The contents with respect to Events or Information other than those mentioned above shall be moved to archived folder at such frequency as may be decided by the Authorised person subject to the provisions under Applicable Law, if any.

6. Removal of Archived documents

The archival of Events or Information as disclosed or hosted on the webiste shall be done in the following manner:

- a) Where there is a period for which a Document is required to be archived as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for a period of not less than three years.

After the expiry of the period as stated hereinabove, the archived disclosures/announcements shall be removed from the website of the Company.

7. Access to the Archived documents

The contents of archived folder, on the website of the Company shall not be accessible to public.

8. RETENTION of documents

This policy sets the standards for managing, storing and preservation of documents of the Company, broadly classified in the following two categories as per Annexure-1, which may be preserved, in physical and /or electronic mode:

- 8.1 Documents to be maintained and preserved permanently by the Company, (including all modifications, amendments, additions, deletions or any changes made therein from time to time).
- 8.2 Documents to be maintained for a term not less than eight years, after completion of the relevant transactions, subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

All other documents and records not mentioned above shall be preserved in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars and notifications etc. and where no time period is prescribed, shall be preserved for a minimum period of 8 (eight) years.

9. Interpretation

The Board shall have the authority for approval of this policy in pursuance to this Regulations and is further 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 Acts and Regulations.

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, regulation or standard. Any change in the prescribed period of archiving in the Regulations or the other Applicable Laws shall *mutatis mutandis* apply to the corresponding related Clause of the Policy.

By order of the Board For Archidply Industries Limited

Rajiv Daga Managing Director

Date: 14-02-2022 Place: Delhi

ANNEXURE-1 TO THE POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS & RECORDS

A. Illustrative list of documents and records whose preservation shall be permanent in nature:

S. No	Nature of Document(s)
1.	Registration Certificates
2.	Certificate of incorporation and Certificate of Commencement
	of Business
3.	Memorandum of Association and Articles of Association;
4.	Licenses & Statutory Approvals
5.	Statutory Registers and index thereof required under applicable
	laws
	to be kept permanently
6.	Pan Card
7.	Minutes of General Meetings, Board Meetings and
	Committees'
	Meetings
8.	Material Agreements / Contracts
9.	Order passed by any Courts or Tribunal or Statutory bodies or
	any authority or judgement/ which are final in nature
10.	Copyrights, Trademarks, industrial designs and Patents etc. owned
	by Company
11.	All books and documents relating to the issue of share
	certificates, including the blank forms of share certificates not less
	than 30 years, and in case of disputed cases, shall be preserved
	permanently
12.	Any other documents which are required to be preserved
	permanently in accordance of applicable law(s), Act, rules or
	regulations, guidelines, circulars and notifications etc. as may be
	applicable to the Company from time to time.
	approache to the company from time to time.

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

SI.	Nature of Document(s)
No	
1.	Books of Accounts
2.	Attendance registers, notices, agenda and notes to agenda of general
	meetings, board meetings and committee meetings and scrutinizer's
	report of general meetings;
3.	Documents relating to Postal Ballots
4.	Disclosure / Declarations received from the Directors
5.	Annual Return(s)
6.	Employment/ Personnel Documents
7.	All Press Releases and publicly filed documents
8.	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)
9.	Documents related to prospectus, Bonus Issue, Rights Issue, Stock
	split, ESOPs
10.	Audited Financial Statements
11.	Insurance Policies/ Claims under various policies
12.	Correspondences with Shareholders
13.	Statutory & Non-Statutory Registers / Documents to be kept for 8
	years or less period.
14.	Vouchers, bills and other supporting documents.
15.	Income Tax Returns & Acknowledgements
16.	Any other document which are required to be preserved for not less
	than 8 years in accordance with the provisions of applicable law(s),
	Act, rules or regulations, guidelines, circulars and notifications etc.
	as may be applicable to the Company from time to time.