

AMD Industries Limited

Policy on Preservation of Documents

1. SCOPE:

A policy on preservation of Documents would ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

2. DEFINITIONS

- a) "Act" means the Companies Act, 2013 including any amendment or modification thereof.
- b) "Authorised Person" means any person duly authorised by the Board.
- c) "Board" means Board of Directors of the Company
- d) "Company" means AMD Industries Limited.
- e) "Compliance Officer" means the Company Secretary of the Company or the Authorized Person of the Company for the purpose of this policy and the Regulations.
- f) "Director" means a person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed as a Director in the Company.
- g) "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- h) "Employees" shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.
- i) "Key Managerial Personnel" shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.
- j) "Regulations" shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 including any statutory modifications or re-enactment thereof.
- k) "SEBI" means Securities and Exchange Board of India.
- l) "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- m) "Stock Exchange or Exchanges" shall mean BSE Limited and National Stock Exchange of India Limited
- n) Any other word, term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015,

AMD Industries Limited

Policy on Preservation of Documents

Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

3. Governing/Applicable Laws

This policy shall be governed by SEBI Act 1992, Companies Act 1956, Companies Act 2013, Rules, Regulations, Circulars or guidelines made thereunder, Secretarial Standards, Securities Contract (Regulation) Act, 1956, The Depositories Act, 1996, Labour Laws, Tax Laws, Insurance Laws and all other applicable laws for the time being in force.

4. Coverage

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

5. Classification of Documents

- a. Documents/Records shall be classified in the following categories:
 - i. Mandatory under governing laws
 - ii. Non-Mandatory
- b. Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.
- c. All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
- d. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

An indicative list of the Documents/Records and the timeframe of their preservation is provided in Annexure I.

6. Modes of preservation

The Documents may be preserved in Physical form or Electronic Form. The officer of the Company required to preserve the Document shall be the Authorized Person who is generally expected to observe the compliance of requirements of Governing Laws. The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space. This will be done after obtaining prior approval of the Board.

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.

The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

AMD Industries Limited

Policy on Preservation of Documents

7. Destruction of Documents

Documents which no longer serve a useful purpose should be destroyed. This would free filing equipment for storage of records currently in the conduct of business. Records destruction helps in improving the operational efficiency by reducing the quantity of records to be searched in order to locate the needed information. This applies to both Physical and Electronic Documents.

The Documents shall be destroyed after the relevant or prescribed period, by the compliance officer 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.

A register of the Documents disposed/destroyed shall also be maintained as below:

Particulars of Document alongwith Provision of applicable Law	Date and mode of Destruction	Initials of the Compliance Officer

8. Custody of Documents

All documents shall be under the custody of respective head of the departments as detailed below:

Sl. No.	Documents	Compliance Officer /Authorised Person
1	Minutes / Financial Statements / Statutory Registers, Lease Documents / Legal Documents and Intellectual Property and Trade Secrets / Contracts / Property Records / RBI	Company Secretary / Legal Head / Legal Advisor
2	Tax / Accounting Records / Insurance	CFO / Head (Finance & Accounts)
3	Employment / personal Records / Labour Laws Records / Misc Record	HR Head
4	Electronic Mails	Individual respective sections

All the Authorised Person must be familiar with this policy and educate their Department in this regard. They must restrict access to confidential records. They must coordinate in the destruction of the documents/records when required.

9. AMENDMENTS TO THE POLICY

The Board of Directors shall amend this Policy as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

AMD Industries Limited

Policy on Preservation of Documents

Annexure I

S. No.	Record Category	Record Type	Minimum Retention Requirement
1	Board Meeting & Committee Meeting Records	<ul style="list-style-type: none"> ❖ Agenda ❖ Minutes ❖ Resolutions ❖ Attendance Registers ❖ Adopted Policies ❖ Disclosures of Interests ❖ Internal Audit Reports ❖ Other Miscellaneous reports / records 	Permanent
	General Meeting Records	<ul style="list-style-type: none"> ❖ Registers & Index of Members ❖ Minutes ❖ Attendance Register 	Permanent
	Other Secretarial Records	<ul style="list-style-type: none"> ❖ Incorporation / Conversion / Business Commencement Certificates ❖ Memorandum of Association and Articles of Association ❖ Common Seal ❖ Annual Reports ❖ Various Statutory Registers pursuant to Companies Act, 1956 and or Companies Act, 2013 ❖ Correspondences with Statutory Bodies 	Permanent
		<ul style="list-style-type: none"> ❖ Non-statutory Registers under the Companies Act, 1956 and or Companies Act, 2013 	8 years from Financial year in which the latest entry is made
		<ul style="list-style-type: none"> ❖ Correspondence with the shareholders 	8 years from the date the complaint is resolved
		<ul style="list-style-type: none"> ❖ Annual Returns along with certificates & documents required to be annexed thereto. 	8 years from the date of filing with the Registrar.
	SEBI & Stock Exchange Records	<ul style="list-style-type: none"> ❖ Correspondences with Statutory Bodies ❖ Quarterly / Half-yearly/ Annual / other compliances submitted from time to time ❖ Listing Agreement ❖ Disclosures in Newspaper ❖ Agreement with Registrar & Share Transfer Agent ❖ Adopted Codes under Listing Agreement / Listing Regulations 	Permanent
	Legal	<ul style="list-style-type: none"> ❖ Correspondences with Courts/ other Statutory bodies regarding any petition /case / suits etc. 	Permanent

AMD Industries Limited

Policy on Preservation of Documents

		❖ All Confidential Agreements of Non-Disclosure nature	
	Contracts / Agreements / Purchase Orders	❖ Original / Renewal / Modification and Termination of Contracts / Agreements / Purchase Orders	Permanent
	Property Records	❖ Agreements / Contracts documents relating to acquisition and sale of Property	Permanent
	RBI Records	❖ License Certificate / Renewal Certificate ❖ Statutory Returns / Reports etc. submitted from time to time	Permanent
		❖ Correspondences with Statutory bodies	8 Financial Years following the relevant Financial Year
2	Finance	❖ Audited Financial Statements ❖ Auditor's Report	Permanent
		❖ Books of Accounts & Vouchers	8 Financial Years following the relevant Financial Year
	Taxation	❖ Registration / Amendment Certificate under various relevant provisions in force ❖ Correspondences with the statutory bodies	Permanent
		❖ Preservation of specific books of accounts ❖ Records pertaining to various other laws in force	8 Financial Years following the relevant Financial Year
	Insurance Records	❖ Insurance Policy Execution / Renewal Certificate ❖ Insurance Claims under various Policies	8 years from lapse of the Policy/Settlement of Claim.
3	Personal Records	❖ Official Personnel Files of Active Employees	To be retained during active employment
		❖ Official Personnel Files of inactive Employees	8 years from the date of termination of employment
	Labour Law Records	❖ Registration / Renewal Certificate under various Acts relating to Labour Laws. ❖ Maintenance of various Registers under various Acts in force read with Rules/Regulations made there under relating to Labour Laws.	Permanent
	Misc Licences obtained from Statutory Authorities	-	Permanent