

**PRESERVATION OF DOCUMENTS
&
ARCHIVAL POLICY
OF
MPS INFOTECNICS LIMITED**

PREAMBLE

In terms of Regulation 9 of the **SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015** (“Listing Regulations”), the Board of Directors (the “Board”) of MPS Infotecnics Limited (“the Company”) is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations in at least two categories as specified in the said Regulation.

In terms of Regulation 30 (8) of the Listing Regulations, the Company is required to formulate an **Archival Policy** for all disclosures of events/information to the Stock Exchanges in terms of the Company’s Policy for Disclosure of Events/information.

OBJECTIVE

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under the **SEBI (Listing Obligations Regulations) 2015** (“LODR”), in terms of Regulation 9 and also to archive any of the material events or information which are disclosed by the Company to the Stock Exchanges in terms of Regulation 30.

POLICY FOR PRESERVATION OF DOCUMENTS

1. Documents and Records of the Company required to be maintained under the Listing Regulations shall be classified in two categories as below:
 - a. **Documents whose preservation shall be permanent in nature** as given in “**Annexure-A** attached to this Policy subject to modifications, amendments, addition, deletion or any changes made therein from time to time;
 - b. **Documents with preservation period of not less than eight (8) years after completion of the relevant transactions** as given in **Annexure-B** attached to this Policy subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;
 - c. Any other documents which are required to be preserved till the closure of the event.
2. The listing documents and records in physical form shall be in the custody of the Company Secretary and/or any other officials as may be authorized by the Board.
3. The Company may keep the listing documents and records as specified above in electronic

mode.

MODES OF PRESERVATION

The Documents above mentioned may be preserved in:

- a. Physical form, or
- b. Electronic Form.

ROLES & RESPONSIBILITIES

The respective Functional / Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

ARCHIVAL POLICY

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years.

WEBSITE UPDATION / UPDATES

The Company shall upload the approved policy on its website www.mpsinfotec.com

AMENDMENT

The right to amend/modify/interpret this Policy vests in the Board of Directors of the Company.

DESTRUCTION OF DOCUMENTS

The documents which are not required to be maintained and preserved permanently may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads.

ANNEXURE - A

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

- 1.** Certificate of Incorporation;
- 2.** Memorandum and Articles of Association;
- 3.** Agreements made by the Company with Stock Exchanges & Depositories, etc.;
- 4.** Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013;
- 5.** Register and Index of Members, debenture-holders, if any or other security holders, if any;
- 6.** Register of Contracts, if any, as per Companies Act, 2013;
- 7.** Register of Charges, if any, as per Companies Act, 2013;
- 8.** Register of Investments, if any, as per Companies Act, 2013;
- 9.** Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register etc.;
- 10.** Authorization / licenses, if any, obtained from any statutory authority;
- 11.** Policies of the Company framed under various regulations/laws/rules etc.;
- 12.** Certificates obtained from various statutory authorities;
- 13.** Such other records as may be required under any law from time to time.

ANNEXURE - B

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

1. Instrument creating or modifying or satisfying Charge (from the date of creation or modification or satisfaction of charge), if any, as per Companies Act, 2013;
2. Annual Return as per Companies Act, 2013;
3. Register of Deposits, if any, as per Companies Act, 2013;
4. Register of Allotment (from the date of each allotment) as per Companies Act, 2013;
5. Annual financial statements including:
 - Annual accounts
 - Directors report
 - Auditors report
6. Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013 and/or any other act for the time being in force;
7. Income Tax Returns filed under Income Tax Act, 1961;
8. All notices in form MBP-1 received from Directors and KMPs along with any amendment thereto;
9. Return of declaration submitted by the Directors or Key Managerial Personnel in respect of beneficial interest in any share as per Companies Act, 2013;
10. Copy of newspaper advertisement or publications;
11. Compliance Reports received from any statutory authority;
12. The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means;
13. Disclosure/Return filled under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015
14. Records, if any, relating to Court Cases/Civil Suits/Arbitration Cases;
15. Register of Inter Corporate Loans and Investments, if any, as per the Companies, 2013;
16. Forms and Returns filed with MCA or with any other statutory Authority;
17. All Emails received from Internal and External Sources related to business issues;
18. Any other document as may be required to be maintained for eight years in terms of applicable law(s).