

LUMAX AUTO TECHNOLOGIES LIMITED

POLICY FOR PRESERVATION AND ARCHIVAL **OF DOCUMENTS**

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1. **BACKGROUND**

This policy seeks to ensure that the Company's business is adequately documented that are then managed in accordance with best practice.

2. **SCOPE & PURPOSE**

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations") requires the Company to formulate a policy for preservation of documents/ records to identify documents that need to be maintained, preserved, and disposed. The policy for preservation of documents/ records has been aligned with the provisions of the Companies (Preservation and Disposal of Records) Rules, 1966. The policy for preservation of documents/ records shall come into effect from 1st December 2015.

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval, and management of documents is critical.

3. **DEFINITIONS**

- (i) **"Board of Directors"** or **"Board"** shall mean the Board of Directors of the Company, as constituted from time to time.
- (ii) **"Company"** shall mean Lumax Auto Technologies Limited.
- (iii) **"Documents"** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- (iv) **"SEBI Listing Regulations"** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- (v) **"Archival"** means accumulation/storage of historical records on server/network or at a physical place.
- (vi) **"Preservation"** or **"preserve"** means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.

4. **REGULATORY FRAMEWORK**

Chapter III of these SEBI Regulations, titled "Common Obligations of Listed Entities" enumerates the general obligations of compliance which every listed entity has to abide by.

Thus, Regulation 9 of the aforesaid Chapter enumerates on Preservation of the Documents approved by its Board of Directors, either in Physical or Electronic form.

5. REQUIREMENTS

5.1 Regulation 9 of the SEBI Regulations requires listed entities to have a Policy on Preservation of Documents approved by its Board of Directors, classifying the documents in at-least two categories, which are as follows:

- a. Documents whose preservation shall be permanent in nature; and
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions.
- c. any other Document, for such period, as may deem fit by the authorized person.

5.2 Accordingly, this policy is framed as per the requirements of the SEBI Regulations.

The policy is applicable to all departments of the Company. The preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability. The policy would ensure safekeeping, confidentiality of the records and safeguard the documents from getting manhandled. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/ destruction of the documents.

6. POLICY

6.1 Preservation:

- a. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards, and the SEBI Regulations and all other applicable law, rules, regulations, internal policies of the Company, in force.
- b. All the documents and records stated in **Annexure A** to this policy shall be preserved permanently by the Company.
- c. All the documents and records stated in **Annexure B** to this policy shall be preserved for not less than 8 years or such other longer period as may be prescribed under applicable laws/ rules/ regulations for the time being in force and thereafter the records can be destroyed.
- d. The Company shall adhere to the applicable provisions of law/ rules/ regulations with regard to the manner of maintenance of records.

6.2 **ARCHIVAL**

- a. The document and records which are no longer current, but which are required to be preserved for a specified period of time or permanently under the applicable laws/ rules/ regulations shall be archived by the Company.
- b. Every Function/Unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this policy.
- c. Every Function/Unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- d. The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

7. **MODES OF PRESERVATION**

The Documents may be preserved in Physical or Electronic mode. 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 prohibition of unauthorized access.

Maintenance of records in electronic form:

Pursuant to Section 120 of the Companies Act,2013 read with Rule 27 of the Companies (Management and Administration) Rules,2014 The documents in electronic form shall be maintained in following manner:

- a) the records are maintained in the same formats and in accordance with all other requirements as provided in the Act or the rules made there under;
- b) the information as required under the provisions of the Act or the rules made there under should be adequately recorded for future reference;
- c) the records must be capable of being readable, retrievable and reproducible in printed form the records are capable of being dated and signed digitally wherever it is required under the provisions of the Act or the rules made there under;
- d) the records, once dated and signed digitally, shall not be capable of being edited or altered;
- e) the records shall be capable of being updated, according to the provisions of the Act or the rules made there under, and the date of updating shall be capable of being recorded on every updating

Custody of the Documents

Subject to the applicable Law, the custody of the Documents shall be with the Authorized Person. Where the Authorized Person submits resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the policy.

8. AUTHORITY TO MAKE ALTERATIONS TO THE POLICY

The Board is 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. The Company Secretary, being the Compliance officer is also authorized to make amendments in the policy, in case of any statutory changes necessitating such amendment.

9. DESTRUCTIONS OF DOCUMENTS

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.

The document shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after exercising due diligence while destroying any documents including seeking confirmation from other relevant departments or any authority as required under the Applicable Law pursuant to which the Documents have been preserved.

(In case any Company records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), or in exceptional cases i.e. if the record has certain special features or such a course is warranted by the peculiar needs of the department then such records shall be preserved until it is determined the records are no longer needed.)

10. CONVERSION OF THE FORM IN WHICH DOCUMENTS ARE PRESERVED

The Physical Documents preserved may be converted, whenever required or felt necessary by the authorized person, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

11. GENERAL

a) Review

This policy will be reviewed and amended as and when required by the Board.

b) Disclosure of the Policy

This policy will be uploaded on the Company's website

c) Amendment

This policy document has been last amended/modified by the Bord of Directors in its meeting held February 13, 2023.

Annexure – A

1. Registration Certificate
2. Memorandum and Articles of the Company
3. Affidavit from the subscribers to the memorandum and from person named as the first directors
4. Statutory Registers required under applicable laws
5. Audited financial statements
6. Minutes of Board/General/Committee Meetings
7. Material Agreement/Contract
8. Order issued by Courts/Statutory Bodies
9. Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

Annexure – B

1. Books of Accounts
2. Annual Return(s)
3. Personnel Documents
4. Insurance Policies/Claims under various
5. All notices pertaining to disclosure of interest of directors
6. Correspondence with Department/Shareholders
7. Non-Statutory Registers/Documents
8. Certificates surrendered to a Company
9. Instrument creating a charge or modification
10. Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time