

**Policy for Preservation of
Documents and Archival Policy of
ITL Industries Limited
Under Regulation 9 of the SEBI (Listing
Obligations and Disclosures Requirements)
Regulation, 2015**

Policy for Preservation of Documents of ITL Industries Limited under Regulation 9 of the SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015

1. STATUTORY MANDATE & OBJECTIVE

The policy on preservation of documents is mandated by the provisions of Chapter III of SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015, to safeguard significant documents and preserve them to ensure durability of documents including documents in electronic form. This policy may be reviewed by Board of Directors and amendments can be made to comply with any requirements under any statute or regulation, from time to time.

2. PURPOSE OF THE POLICY

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:

- a) Documents whose preservation shall be permanent in nature;
- b) Documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clause (a) and (b) in electronic mode. Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company. Besides the above, as per applicable provisions of Companies Act, 2013 certain documents are required to be preserved permanently or upto a certain prescribed time. Accordingly this policy is being framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

3. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

The classification of documents to be retained and preserved for are as follows:

- Documents that need to be preserved / retained permanently;
- Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or Listing Regulations;
- Documents to be preserved electronically and archived when necessary;

- Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case;
- Documents like budget papers etc., which may be retained for less than 8 years.

4. 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 on the advice of the concerned Functional / Department / Group Head.

5. PROCESS:

A) Permanent Preservation:

- Registration Certificates obtained from various statutory authorities.
- Licenses & Statutory Approvals.
- Documents related to Development/Intellectual Property and Trade Secrets.
- Policies of the Company framed under various regulations.
- Records relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register.
- Investment Documents/proofs including certificates etc.
- Orders issued by Courts/Statutory bodies.
- Material Agreements/Contracts.
- Memorandum and Articles of Association as amended from time to time.
- Minutes of General Meetings, Board meetings and various Committee Meetings.
- Statutory Registers required under applicable laws except Register of Charge & Register of Deposit.
- Any other document as may be required to maintain permanently in terms of applicable law(s).

B) Preservation for 8 years:

- Annual Return(s) as per Companies Act, 2013.
- Forms and returns filed with RBI/MCA or with any other statutory authority.
- Register of Charge & Register of Deposit as per Companies Act, 2013

- Annual financial statements including: Annual accounts, Directors report, Auditors report
- Notice, scrutinizer's report, Proxy forms, Representation letters, Poll receipts and other Documents related to General Meeting.
- Notice, Agenda, Circular resolutions and other Records related to Board Committee Meeting.
- Compliance Reports received from any statutory authority.
- Copy of newspaper advertisements or publications.
- All Records under the Listing Regulations.
- Income Tax Returns filed under Income Tax Act, 1961.
- Employment and personnel records.
- Correspondences with Departments/shareholders.
- Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
- Any other document as may be required to maintain in terms of applicable law(s)

C) Other Documents may be stored and preserved in physical form/ electronic form, after the completion of the relevant transactions, for such period as may be required.

6. ELECTRONIC DOCUMENTS INCLUDING EMAIL RETENTION AND BACK UP:

- All e-mail – from internal and external sources to be deleted after they cease to be of current use.
- Employees should keep emails related to current business issues.
- I.T Department would archive email for 7 years on email archival server after the employees have deleted it, post which time the email will be permanently deleted.
- Employee will not store or transfer the Company related emails on non except as necessary or appropriate with due approvals from the respective Head of Department.
- Employees will take care not to send confidential information to outsiders.

7. WEB PAGE FILES:

- All such events / information hosted on the Company's website shall be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
- After the initial period of 5 years, documents / information (except documents of permanent nature) shall be archived by the I.T. department for a further period of 3 years.
- Documents of permanent nature, uploaded on the Company's website, shall be

archived by the I.T. Department.

8. RESPONSIBILITY:

The responsibility for preservation of the documents will be on the concerned department heads. Head – IT will be responsible for all the documents preserved in electronic mode.

9. AMENDMENT

In accordance with the powers vested in the Board, this Policy has been amended with effect from 14th February 2025. The Board reserves the right to amend any provisions of this Policy substitute any existing provisions with new ones, or replace this Policy entirely with a new Policy as deemed necessary.