



DOCUMENT RETENTION AND ARCHIVAL POLICY

AZAD ENGINEERING LIMITED

(Formerly Azad Engineering Private Limited)

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1. Purpose and Scope

The purpose of this document is to present a policy statement for Azad Engineering Limited (Formerly known as “Azad Engineering Private Limited”) (“**Company**”) regarding preservation of its documents and archival of documents on the website in accordance with the provisions of the Companies Act, 2013 and Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. Modes of Preservation

The preservation of documents should be such as to ensure that there is no tampering, alteration and destruction. Nothing shall be done which endangers the content, authenticity, utility or accessibility of the documents. The documents may be preserved in:

1. Physical Form, and/or in
2. Electronic Form

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.

3. Periodical Review of the Policy

The Chief Executive Officer/ Managing Director/ Whole-time Director of the Company is authorised to periodically review the policy and make such changes as considered necessary.

4. Destruction Of Records

The records/ documents preserved shall be reviewed every year or periodically according to the need of the respective departments and actions shall be taken to destroy those records which are due for disposal.

5. Suspension of Records Disposal in the event of Litigation/Claims

In the event the Company is served with any notice for documents from any statutory authority or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of notice/litigation, etc. shall be suspended until such time the matter is settled or resolved or disposed off. The Company Secretary shall immediately inform all employees of the Company for suspension of further disposal of Documents.

6. Policy Review

This Policy is framed based on the requirements of Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015. The Board of Directors may subject to applicable laws amend/substitute any provision(s) with a new provision(s) or replace this Policy entirely with a new policy. If any subsequent changes in the Companies Act, 2013 or the SEBI Listing Regulations are inconsistent with any part of this Policy, the provisions of the Companies Act or the SEBI Listing Regulations, as the case may be, shall prevail over the Policy and the provisions in the Policy shall be modified to make it consistent with such applicable law.

7. Records as per the Companies Act, 2013 and SEBI Regulations

Except for documents and records, which are required to be maintained permanently under the Companies Act, 2013 and SEBI Regulations, the Company shall maintain all other records for no less than three (3) years. Documents that are to be made available on the Company's website in Compliance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 will be made available on the website for a period of three (3) years and thereafter will be archived for a period of three (3) years.

Additionally, there are certain types of records that need to be retained for a longer period of time, as identified below.

- i. **Records of Board of Directors/ Committees:** Minutes of Meetings of the Board of Directors shall be maintained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for not less than Three (3) years.
- ii. **Press Releases & Public Filings:** All press releases and publicly filed documents shall be maintained in perpetuity. All events and press releases filed with the stock exchanges shall be maintained for not less than Five (5) Years on the website of the company.

- iii. **Books of Accounts and Tax Records:** Books of accounts and Tax records should be retained for at least Eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used.
- iv. **Employment Records:** The Company maintains personnel records including but not limited to recruitment, employment and personal information. These records also reflect performance review and any other matters arising out of the course of employment, such as actions taken against personnel. These records should be retained for a period of Three (3) years following the cessation of employment.
- v. **Intellectual Property Records:** Documents relating to the development and protection of Intellectual Property Rights should be maintained for the life of such Intellectual Property Rights.
- vi. **Legal Documents/Contracts:** Legal Documents shall include, but shall not be limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, documents relating to cases pending in any Court or Tribunal or any other authority empowered to give a decision on any matter, awards, documents relating to property matters. Execution copies of all contracts entered into by the Company should be retained for at least Three (3) years following the expiry of termination of the contracts. Documents relating to any property owned by the Company shall be retained perpetually. Other property Documents shall be retained for a period of 8 (Eight) years or for a period of 8 (Eight) years after the rights in such property ceases to exist, whichever is higher. Pleadings shall be retained for a period of 8 (Eight) years or till the matter has been disposed off, whichever is higher.

8. Record Maintenance and Storage

All records in physical form are to be maintained by the respective department(s) at the respective locations.

Electronic version(s) of all of the records are to be maintained within the Company's centralized electronic record software database, as maintained by the IT Services Department.

9. Disposal of Records

Physical records disposed of pursuant to the retention periods specified in the Document Retention Schedule shall be disposed of using a cross-cut shredder. The Records Department shall adopt appropriate procedures to permanently dispose of any non-paper physical records, such as photographs or audio/video recordings



In the event that it is necessary to manually dispose of an electronic record, the IT Department shall use the “permanent delete” function to permanently dispose of electronic records.

10. Hold on Record Destruction and Deletion

If a lawsuit or other proceeding involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, must cease immediately. Documents relating to the lawsuit or potential legal issue will then be retained and organized under the supervision of the IT Manager

Violation of this aspect of the Company’s Document Retention Policy could subject the Company and the employees involved to civil and criminal penalties.

In the event of a Document Hold Direction, the IT Department shall immediately disable the “permanent delete” and “automatic delete” functions of the Company’s software with respect to the designated records and disable the automatic deletion of recycle bins and deleted items folders on appropriate Company computers; the Records Department shall immediately suspend all disposition of records maintained on-site or off-site location as appropriate; and the above official shall immediately notify all appropriate employees by email that they are not to dispose of relevant Temporary Records or other records until notified otherwise.

In the event of a major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery action will take precedence over all the Company activities.

11. E-mail Policies

All electronic communication systems as well as all communications and stored information transmitted, received, or contained on the Company’s information systems are the property of the Company. Employees using this equipment for personal purposes do so at their own risk. Employees have no expectation of privacy in connection with the use of Company equipment or with the transmission, receipt, or storage of information using the Company’s equipment. Authorized Company personnel may access communications and stored information at any time without notice or consent.

Employees should avoid using Company e-mail for personal purposes. Personal e-mails should be deleted as soon as possible.

E-mails relating to audit work papers and financial controls should be retained for at least 8 years.



All emails to the Company's Officers or Audit Committee relating to complaints on auditing, accounting, frauds or internal controls should be retained permanently.

Any messages exchanged between the Company and third parties (such as consultants and auditors) should be archived, regardless of their content. Instant messages have the same status as emails and should be treated identically.

12. Back-Up & Compliance

The Company has made appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability.

Failure to comply with this policy may result in disciplinary action against the employee, including suspension or termination.

Questions regarding this policy should be addressed to cs@azad.in.

13. Archival Policy

- i. The Company will host all the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations on the website of the Company under the section entitled ["Investor Services"] for a period of three years and thereafter the same shall be archived for retrieval for a period of 3 years such period as decided by the Chief Executive Officer of the Company.
- ii. This Policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.
- iii. This Policy shall also be disclosed on the website of the Company.
