

**POLICY FOR PRESERVATION OF  
DOCUMENTS**

**WAISL LIMITED**

## **PREAMBLE**

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time [“LODR Regulations”] mandates every listed company to form a policy for preservation of its documents, approved by its Board of Directors (herein referred to as “Board”) classifying them in at least two categories 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.

The Company may keep documents specified in clauses (a) and (b) above in physical / electronic mode.

The Policy has been approved by the Board of the Directors of the Company and will be effective from November 13, 2023.

## **PURPOSE**

The objective of the Policy is to ensure that all important documents, generated or received by the Company, are adequately maintained and preserved in compliance with the applicable statutory provisions and to facilitate destruction of documents that are no longer required, at an appropriate time in specified manner.

## **SCOPE**

This policy shall apply to all documents which includes records maintained in the form of books or stored in computer or tapes or discs or in any other electronic form or transcribed information of any type whether expressed in ordinary or machine language.

The preservation of documents, as mandated under the policy, shall apply to all documents regardless of its location, including all Company locations, off-site locations, computer storage or employees' laptops etc.

## **OBJECTIVES**

The objective of the Policy is to ensure that all important documents, generated or received by the Company, are adequately maintained and preserved in compliance with the applicable statutory provisions and to facilitate destruction of documents that are no longer required, at an appropriate time in specified manner.

The policy establishes the guidelines for management, retention, preservation and destruction of documents, both in physical form and electronic form by the Company.

## **DEFINITIONS:**

- i. **Board of Directors or Board** means the Board of Directors of the Company, as constituted from time to time.
- ii. **Documents** shall mean all corporate records which include papers, files, registers, writings, memos, communications, agreements, press releases,

approvals and the like as may be required under any law or regulation for the time being in force but not limited to emails and attachments, scanned papers, word documents, presentations, spreadsheets, databases, pictures, graphics.

- iii. **Electronic Form** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- iv. **Maintenance** means keeping Documents, either physically or in Electronic Form.
- v. **Preservation** means to keep in good order and to prevent from being altered, damaged or destroyed.

The words and phrases used in this policy which are not defined here, shall derive their meaning from the Applicable Law.

### **CLASSIFICATION OF DOCUMENTS**

Based upon the recommendations of the management, the Board of Directors have classified that the documents will be retained and preserved as tabulated hereunder:

<b>Sl. No.</b>	<b>Particulars</b>	<b>Annexure</b>
1.	Documents that needs to be preserved/retained permanently	Annexure 1
2.	Documents that may be preserved/retained for a period of 08 years or more after the end of the financial year	Annexure 2

The documents concerning other routine matters and having substantial long-lasting consequences shall be preserved by all the Concerned Persons/Regional Heads/Finance Head/CFO and/or The Departmental Heads of the Company depending upon the usefulness and necessity.

### **MODE OF PRESERVATION, AUTHORITY & RESPONSIBILITY**

Documents may be preserved in physical form or electronic form as per various statutory requirements and are subject to the same degree of confidentiality and care.

The official of the Company required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be of such manner so 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 the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

## **DESTRUCTION/DISPOSAL OF DOCUMENTS**

Disposal of documents after the expiry of statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors. Before disposing a soft copy shall be taken for the record.

This applies to both physical and electronic documents.

## **REVIEW / AMENDMENT**

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments. The Board of Directors can 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.

**Annexure 1****Documents whose preservation shall be permanent in nature:**

<b>S. No.</b>	<b>Nature of Document(s)</b>
01	Registration and Incorporation Certificates.
02	Licenses & Statutory Approvals.
03	Statutory Records and Registers required under applicable laws.
04	Common Seal.
05	Minutes of the meetings of General Body, Board and its Various Committees.
06	Material Agreements/Contracts.
07	Orders issued by Courts/Statutory bodies/Central Government Approvals received.
08	Investment Documents/proofs including certificates etc.
09	Any other document/record/information as may be required to be maintained permanently in terms of applicable law(s), maintained and preserved from time to time.

**Annexure 2****Documents with preservation period of not less than eight years after completion of the relevant transactions:**

<b>S. No.</b>	<b>Nature of Document(s)</b>
01	Books of Accounts, Financial Statements.
02	Annual Return(s).
03	Personnel Documents.
04	Insurance Policies/ Claims under various policies.
05	Correspondences with Departments/shareholders/debenture holders.
06	Non-Statutory Registers/Documents.
07	Any records or documents connected with legal proceedings save and except records or documents of proceedings which the management has appropriately decided not to maintain.
08	Any other document as may be required to be maintained in terms of applicable law(s), maintained and preserved from time to time.