



TRISHAKTI INDUSTRIES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS & ARCHIVAL PROCESS

Effective- April 28, 2025

[As revised and approved by Board of Directors on April 28, 2025]

Trishakti Industries Limited

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Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read in conjunction with Regulation 30(8) of the Listing Regulations, all listed entities are mandated to establish a policy governing the preservation of documents and the archival process, ensuring compliance with the regulatory requirements.

1. OBJECTIVE

The Board of Directors of Trishakti Industries Limited has established a Policy for Preservation of Documents and Archival Process. This policy encompasses the preservation of various documents, including registers, forms, returns, statements, and other records pertinent to the Company's corporate entity, functions, and business operations.

The policy also outlines the archiving process for these documents. As preservation of documents is a statutory requirement, this policy aims to provide a framework for maintaining documents under applicable laws, ensuring important data backup, and preventing accidental or innocent destruction.

The policy's objectives are multifaceted:

- a. Compliance with Statutes: Ensure adherence to various laws and regulations requiring document preservation.
- b. Evidence and Audit Purposes: Maintain documents as evidence in legal processes and for audit requirements.
- c. Management Requirements: Preserve documents for management purposes, ensuring continuity and informed decision-making.
- d. Data Backup and Security: Safeguard important data through regular backups and secure storage.

2. DEFINITIONS

In this Policy unless the context otherwise requires,

“Act” means the Companies Act, 2013 or the Securities and Exchange Board of India Act, 1992 or any statutory modification or re-enactment thereof and includes any Rules and Regulations framed thereunder, as the case may be in respect to the reference made in the provisions under this Policy;

“Articles” means the Articles of Association of the Company, as modified from time to time;

“Authorized Person” means any person duly authorized by the Board, Managing Director or any Executive Director of the Company.

“Board of Directors” or “Board” means the collective body of the Directors of the Company;

“Books of account” means as defined in the Act;

“Committee” means a Committee of the Board;

“Current Document(s)” means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceeding, complaint, dispute, contract, or any like matter;

“Document” means all papers, files, books of account, certificate, summons, notice, license, requisition, order, declaration, confirmation, evidentiary record, electronic record, electronic mail, instrument, statements, agreements, deeds, permissions, press release, returns, official publication, report, policies, record, form, register, voucher, ledger, minute book, Floppies, CDs, DVDs, Electronic Storage Devices, etc whether issued, sent or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic mode etc;

“Electronic mail” means the message sent, received or forwarded in digital form using any electronic communication mechanism that the message so sent, received or forwarded is storable and retrievable;

“Electronic mode” means data sent, received or forwarded is storable and retrievable using electronic medium;

“Electronic record” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000;

“Key Managerial Personnel (KMP)” shall include :

- The Managing Director
- The Chief Executive Officer
- Whole-time Director
- The Company Secretary;
- The Chief Financial Officer and Compliance Officer
- Any other person as defined under the Companies Act, 2013 and as per SEBI and changes made from time to time

“Maintenance” means keeping document(s), either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such documents;

“Meeting” means a meeting, duly convened and constituted, of the Board or any committee thereof or of the Members of the Company;

“Member” means any person who agrees, either by subscribing to the Memorandum of Association of the company or by applying in writing, to become a member of the company and whose name is entered either in the Register of Members of the Company or in the records of the Depository as a beneficial owner in respect of the equity shares of the Company held by him;

“Preservation” means to keep in good order; to prevent from being damaged or destroyed;

“Record” means documentary evidence of past events or transactions;

“Register” means a register maintained under the Act and includes registers referred to in this Policy;

“Senior Management” shall mean officers/personnel of the listed entity who are members of its core management team excluding board of directors and normally this shall comprise all members of management one level below the chief executive officer/managing director/whole time director (including chief executive officer/, in case they are not part of the board) and shall specifically include company secretary and chief financial officer.

3. CLASSIFICATION OF DOCUMENTS

Documents of the Company which are to be preserved are classified into the following categories:

1. Documents which shall be preserved be permanent; &
2. Documents which shall be preserved for a period of not less than 8 years from the date of completion of relevant transactions.

4. MODES OF PRESERVATION

1. The Documents may be preserved in
 - Physical form or
 - Electronic Form
2. The officer of the Company required to preserve the Document shall be Authorized Person who is generally expected to observe the compliance of requirements of Applicable Law.
3. 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 prohibit unauthorized access.

5. AUTHORITY FOR APPROVAL OF POLICY

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via the Regulations.

6. CUSTODY OF THE DOCUMENTS

- a. Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tenders 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 to the Company Secretary/ Managing Director or to such other person as the Managing Director may authorise for the time being.
- b. Information of the cessation or transfer of the Authorised Person is to be also intimated to the legal and information technology department of the Company.

7. CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED

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. This will be done after obtaining prior approval of the Board.

8. AUTHENTICITY

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

9. ARCHIVAL PROCESS FOR THE DOCUMENTS

The disclosures made to the Stock Exchanges under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be hosted on the website of the Company for a period of five years from the date of its disclosure. Disclosed Information which was over five years old will be archived from the website of the Company for another period of three years by storing the same on suitable media. Anyone intending to review that Disclosed Information may write to Compliance Officer of the Company. Thereafter the said records shall not be destroyed or purged without requisite permission of the respective functional heads who are authorized to preserve such documents.

However, for any disclosure of event which is the subject matter of any ongoing litigation and/or required to be preserved in terms of applicable provisions of Law/Statute, such disclosure shall continue to remain on the website of the Company irrespective of its duration thereat.

10. DESTRUCTION/DISPOSAL OF DOCUMENTS

- a) 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.
- b) The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice.
- c) The documents mentioned in this Policy, kept by the Company, may be destroyed after the expiry of the minimum retention period. However, in the case of pending matters/ litigation/ disputes, the documents shall be preserved till the resolution of pending matter/ litigation/ dispute. A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.
- d) The entries in the register shall be authenticated by the Authorised Person(s).

11. LOCATION OF THE RECORDS

The overriding principle guiding the choice of location of records is that they will continue to be available to Management on a timely basis. The following principles will be considered for selecting the record location:

- The records and data are available to management on a timely and reasonable basis
- Adequate back-up facilities will be made available for electronically stored data
- Accessibility of the record location from the point of view of audit, internal and external auditors
- Secrecy and confidentiality of data to be maintained.
- Safety of Records both in house and third party (with economy in cost)

12. MONITORING AND EVALUATION OF THE POLICY

This Policy will be reviewed by the Board from time to time and if required, modify the same in order to comply with the statutory requirements and also to incorporate the best industry practices.

13. POLICY REVIEW

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for approval and noting at a meeting of the Board.

In the event of any conflict between the provisions of this Policy and of the Act or regulations or any other statutory enactments, the provisions of such Act or regulations or statutory enactments would prevail over the Policy and the provisions in the policy would be modified in due course to make it consistent with law.

14. DISCLOSURE

This policy shall be hosted on the website of the Company and a web link thereto shall be provided in the annual report of the Company. The necessary disclosure about the policy further, if any, will also be made as per requirements of the Act.

Annexure-I**List of Documents**

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
As per Companies Act, 2013	
<ul style="list-style-type: none"> ➤ The memorandum and articles of the company ➤ Affidavit from the subscribers to the memorandum and from persons named as the first directors ➤ Register of members ➤ Books and Documents relating to the issue of share certificates, including the blank forms of share certificates ➤ The foreign register of members ➤ Register of charges ➤ Minutes book of general meeting ➤ Register of particulars of loans and guarantees given, securities provided and acquisitions of securities made. ➤ Register of particulars of investments in shares or other securities beneficially held by the company. ➤ Register of contracts or arrangements in which directors are interested. ➤ Register of Renewed and Duplicate Share Certificates. ➤ In case of disputed cases, all books and documents relating to the issue of share certificates, including the blank forms of share certificates 	<ul style="list-style-type: none"> ➤ Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities) ➤ Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar) ➤ Foreign register of debenture holders or any other security holders (8 years from the date of Redemption) ➤ All notices pertaining to disclosure of interest of directors for a period of 8 years from the end of the financial year to which it relates. ➤ All certificates surrendered to a company (3 years from date of surrender) ➤ Register of deposits (not less than 8 years from the date of last entry) ➤ Instrument creating a charge or modification (8 years from date of satisfaction of charge) ➤ The postal ballot and all other papers relating to postal ballot including voting by electronic means, (as long as they remain current or for 8 financial years), whichever is later. ➤ All books and documents relating to the issue of share certificates, including the blank forms of share certificates not less than 30 years
Secretarial Standard	
<ul style="list-style-type: none"> ➤ Minutes of Board meeting (SS-1) 	<ul style="list-style-type: none"> ➤ Office copies of Notices, Agenda, Notes on Agenda and other related papers (as long as they remain current or for 8 financial years), whichever is later. (SS- 1) ➤ The attendance register for a period of at least 8 financial years (as long as they remain current or for 8 financial years), whichever is later. (SS-1) ➤ Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2)