



POLICY ON PRESERVATION OF DOCUMENTS

INTERARCH BUILDING PRODUCTS LIMITED



1. Purpose

1.1 Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 has mandated listed companies to adopt and implement a policy on the preservation of documents.

2. Overview and Effective Date

2.1 This policy on the preservation of documents (**'the/this Policy'**) covers various aspects of the preservation of documents and also the safe disposal/destruction of the documents in line with the statutory requirements pertaining to the same.

2.2 The Policy shall come into effect from 15th January, 2024.

3. Scope

This Policy is extended to all business units, functions, and departments of **INTERARCH BUILDING PRODUCTS LIMITED ("Company")**.

4. Requirements for Preservation/Retention of Documents/Records

4.1 The documents/records shall always be preserved/retained for a period in accordance with the statutory requirements applicable to them from time to time.

4.2 All records which are temporary in nature must be preserved for not less than 8 years or such other period as may be prescribed under any law for the time being in force and which are needed to be preserved by the Company permanently during the entire life of the Company is attached with this Policy as annexure 1 (**'Annexure 1'**). Any changes in Annexure 1 can be made with the approval of the Managing Director of the Company.

4.3 Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for a period longer than necessary.

4.4 In case there is a change in the statutory requirements for the preservation of documents, this Policy shall automatically stand revised and corresponding changes will be made in Annexure 1 with the permission of the Managing Director.

5. Modes of preservation

5.1 Documents may be preserved in
a. Physical form or
b. Electronic Form
as per the statutory requirements from time to time.

"Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on the 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.

5.2 The preservation of documents should be such to ensure that there is no tampering, alteration, destruction, or anything which endangers the content, authenticity, utility, or accessibility of the documents.



- 5.3. The preservation of documents should be at the Company's registered office or such place as the board of directors of the Company may decide.
- 5.3 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.
- 5.4 The preserved documents must be accessible at all reasonable times. Access may be controlled by the head of each respective division/function, so as to ensure preservation and integrity of the documents and prevent unauthorized access.

6. Responsibilities

- 6.1 This Policy is to be administered under the supervision of the Company Secretary and Compliance Officer. The Company Secretary and Compliance Officer is authorized to interpret and apply this policy with such input as may be needed from other departments.
- 6.2 All employees of the Company, shall be responsible for ensuring compliance with this Policy, as related to records in their possession, custody, or control. The employee must notify Company Secretary and Compliance Officer/Managing Director of any significant changes that may impact the Company's records retention schedule as stated in Annexure 1, as related to records in his/her possession, custody, or control.

7. Archival of Records

- 7.1 The Company shall disclose on its website (a) all such events or information which has been disclosed to stock exchange(s) under Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; (b) audio or video recordings and transcripts of post earnings/quarterly calls, by whatever name called, conducted physically or through digital means. Such disclosures, audio or video recordings, and transcripts shall be hosted on the website of the Company for a period of 5 (five) years and thereafter the same shall be archived so as to be available for retrieval for a further period of 3 (three) years by storing the same on suitable media. Thereafter the said information, documents, records, and transcripts may be destroyed as per this Policy.

8. Destruction of Records

- 8.1 The records and documents, after their retention period as stated in Annexure 1, can be destroyed after approval of the Managing Director of the Company.

9. Other requirements

- 9.1 All records relating to, or created, or acquired in connection with the Company's business, property or activities, as well as the information in them, are considered to be the Company's property and do not belong to individual employees or third parties, regardless of the subject matter, storage media or location. Records and the information in them may be used only for Company business purposes and not for any personal purpose of employees. Records may not be copied for personal use or retention or for any other purpose except in furtherance of the Company's business, or as required by law. Employees must return all records to the Company upon request or when separating from the Company.
- 9.2 Confidential information in Company records must be safeguarded from improper disclosure. No records or information in them may be disclosed except in furtherance of the Company's activities.



- 9.3 All Company records are to be protected in safe and secure conditions.
- 9.4 Records are to be destroyed on a regular basis, and as soon as possible following the expiration of their retention period, unless otherwise required by this Policy.
- 9.5 In the event of pending or reasonably foreseeable litigation, summons, government investigation, or audit, affected Employees may retain the relevant records, among other things, until the matter is resolved.



ANNEXURE 1

	Preservation for not less than 8 years or such other period as may be prescribed under any law	Permanent Preservation
1	Proxy forms	Certificate of incorporation
2	Representation letters	Certificate of change of name (if any)
3	Annual reports	Common Seal
4	Annual returns	Memorandum and Articles of Association as amended from time to time
5	Consent and Resignation Letters received from the Directors	Minutes Book
6	Board Agenda and supporting Documents	Circular resolutions
7	Office Copies of Notice of General Meeting and related papers	Statutory Registers
8	NSDL/CDSL Files	Scrutinizers Reports
9	Annual financial statements including: <ul style="list-style-type: none"> - Annual Accounts - Directors report - Auditor's report 	Register of members
10	Declaration by directors under section 164 of the Companies Act, 2013	Index of Members
11	Declaration by directors under section 184 of the Companies Act, 2013	Listing Agreement
12	All documents under the Listing Agreement	License, Permissions, Central Government Approvals Received
13	Notice of General Meetings and Board Meetings	Any other Document / Information / Record as per the provisions of any other applicable Law or Regulation to the extent applicable to the Company.
14	Documents on which the common seal of the company has been affixed	Any court/ NCLT orders
15	Advertisements published	
16	The instrument creating a charge or modification	
17	Disclosures – SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	
18	Disclosures – SEBI (Prohibition of Insider Trading) Regulations, 2015	
19	Protected Disclosures in writing or documented along with the results of investigation relating thereto (including the Investigation Report) as reported under the whistle-blower policy	
20	Records of securities dematerialized and rematerialized	