
DOCUMENT ARCHIVAL POLICY

A. PREAMBLE:

The document archival policy (“**Policy**”) aims to provide a comprehensive policy on the preservation and conservation of the records and documents of Shrem Infra Invest Private Limited. It provides guidance on the preservation and management of documents to help ensure the authenticity, reliability and accessibility of such documents.

The policy aims at identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records. It stipulates the duration and manner in and place at which records and documents of the Company shall be preserved. The board of directors of the Company at its meeting held on 15th March, 2024 approved this policy for preservation of documents. The policy shall be effective from 01st April, 2024.

B. OBJECTIVE AND PURPOSE:

The objective of the policy is to provide a framework for the purpose of preservation of documents and their destruction after the statutory period of preservation is over and documents are no longer required.

In terms of Regulation 9 of the SEBI(LODR), for the purpose of preservation, the documents under the policy are to be classified as:

- Documents to be preserved permanently
- Documents to be preserved for a period of not less than 8 years.

C. DEFINATION:

“**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force and under section 2(36) of the Companies Act, 2013.

“**Policy**” means the Archival Policy of the Company.

D. TYPE OF DOCUMENTS:

The Company’s records and documents can be classified as physical and electronic records. Documents can also be categorised into documents to be preserved for limited life span and those to be preserved permanently.

Physical records would consist of all the hand written or printed and signed books and records maintained by the Company in physical form.

Electronic records would comprise of all such documents which are digitally or virtually maintained in the electronic forms. Electronic record shall be authenticated by digital signatures of authorised persons.

E. PLACE OF PRESERVATION OF DOCUMENTS AND RECORDS:

All records and documents along with all the supportive documents which are physically available shall be maintained at the principal place of business of the Company, presently being 1101, Viraj Towers, Junction off Andheri Kurla Road, W.E. Highway near Land Mark Building, Andheri (East), Mumbai 400093. All the documents required to be maintained Listing Regulations, 2015 as amended or supplemented, including any guidelines, circulars, notifications and clarifications framed or issued thereunder, secretarial standards, listing agreements, and any applicable law, shall be preserved under the custody of the compliance officer /Board of the Company.

F. CUSTODY OF DOCUMENTS:

The documents shall be kept in the custody of Authorized person appointed by the Board of Directors who shall be responsible for creation and maintenance of such documents.

G. METHOD AND TENOR OF PRESERVATION:

All the statutory documents shall be preserved for a minimum period of eight financial years, immediately preceding a financial year. Documents shall be preserved in a chronological manner for each financial year. The person in charge of custody of the documents shall be responsible for proper maintenance and safe keeping of documents under his custody. The Company shall maintain back-up of all documents preserved in the electronic form.

Documents which are confidential in nature shall, wherever possible, be kept under lock and key and shall be shared on need to know basis only with persons directly involved in the transaction involving such documents and records.

H. INSPECTION:

If required under applicable law, some of the registers, documents and records may be required to be kept open by a Company for inspection by Members of the Company and by other persons. Upon receipt of advance notice from any specified person the Authorised person shall facilitate inspection of such documents by such persons and allow extracts to be taken from certain documents, registers and records and to furnish copies of certain documents, registers and records. Such documents and records shall be kept open for inspection during the business hours of the Company without payment of any fee.

I. DOCUMENTS HOSTED ON THE WEBSITE:

Documents which are statutorily required to be hosted on the Company website shall be hosted within the prescribed timeline from the occurrence of the event. All statutory data shall be hosted on the Company website for a minimum period of five years or for such minimum period as prescribed under applicable law, after which it shall be preserved in the archival folder of the Company maintained offline, until it is destroyed upon the expiry of the statutory period for the preservation such documents.

J. DESTRUCTION OF DOCUMENTS:

After the expiry of statutory retention period, the preserved documents, if no longer required, may be destroyed. Documents which are duplicate, unimportant or irrelevant and are not required

to be preserved under any provision of law may be destroyed as a normal routine administrative action. Before destruction the approval of the head of the department and the compliance officer shall be obtained.

K. REGISTER OF DOCUMENTS DESTROYED TO BE MAINTAINED:

The company shall maintain a register under the custody of the compliance officer, for recording documents destroyed. The register shall be named as 'Register of documents destroyed' and shall be preserved permanently. The register shall be placed before the board of directors on a half yearly basis for perusal and noting by the directors.

The register shall contain the following details:

- Serial Number
- Brief particulars of the document destroyed
- Department responsible for creation and maintenance of documents
- Date of approval of the compliance officer
- Date of destruction
- Mode of destruction
- Signature of the compliance officer.

L. AMENDMENT:

The Board of Directors may amend or modify this Policy in whole or in part, at any time, when it is required to be complied with the laws, regulations.

M. REVIEW:

The Board of directors of a company shall need to review the Policy, from time to time, to ensure its effectiveness.

Adopted by the Board of Directors of Shrem Infra Invest Private Limited on behalf of the Trust on March 15, 2024.

For Shrem Infra Invest Private Limited

Nitan Chhatwal
Director
DIN: 00115575