



# **Executive Centre India Limited**

## **Policy on preservation & archival of documents**

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## 1. Introduction

Pursuant to Regulation 9, Regulation 30 and other applicable regulations of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI Listing Regulations**”), every listed company is required to formulate a policy on preservation and archival of documents (“**Policy**”) which must be approved by its board of directors (“**Board**”).

In this context, Board of Executive Centre India Limited (“**Company**”) has formulated and adopted this Policy with the objective of classifying various documents, records and registers for the purpose of maintenance, preservation and archiving.

This Policy is effective from the date of listing of the equity shares of the Company on the stock exchange(s).

## 2. Legal Framework

Regulation 30(8) of the SEBI Listing Regulations requires the Company to disclose on its website all such events or information which has been communicated to the stock exchanges under the SEBI Listing Regulations, for a minimum period of five years and thereafter as per the archival policy of the Company.

In compliance with the above and Regulation 46 of the Listing Regulations, the Company has formulated the following Policy for archival of the disclosures made on the website for information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations.

The Companies Act, 2013 and the rules made thereunder contains provisions for maintenance of various documents including documents, registers and records by the Company; the place at which such documents are to be maintained and the period for preserving such documents.

## 3. Definitions

- 3.1. “**Act**” means the Companies Act, 2013 and the Rules framed thereunder, as amended from time to time.
- 3.2. “**Board of Directors**” or “**Board**” means the board of directors of Executive Centre India Limited; as constituted from time to time.
- 3.3. <sup>1</sup>“**Company**” or “**Listed Entity**” means Executive Centre India Limited.
- 3.4. “**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.
- 3.5. “**Electronic Record(s)**” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- 3.6. “**Electronic Form**” means on any 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.
- 3.7. “**Maintenance**” means keeping Documents, either physically or in Electronic Form.
- 3.8. “**Policy**” means this policy on preservation & archival of documents.
- 3.9. “**Preservation**” means to keep in good order and to prevent from being altered, damaged or destroyed.
- 3.10. “**SEBI Listing Regulations**” means the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015, as amended from time to time.

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<sup>1</sup> The name of the “Company” changed from “**Executive Centre India Private Limited**” to “**Executive Centre India Limited**” pursuant to conversion of the Company from a Private Limited company to a Public Limited company effective from 04 June 2025.

#### 4. Documents to be preserved

This Policy aims to classify the Documents, records and registers of the Company either in physical form or electronic form as given herein:

- (i) to be preserved permanently in the Company's records and
- (ii) to be preserved for a specific period of time.

The applicable provisions of law, rules and regulations with regard to electronic maintenance of Documents shall be adhered to. All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

##### **(i) Documents which are to be preserved permanently in the Company's records:**

The Company shall maintain the following documents on a permanent basis:

- a. Incorporation Documents
- b. The original signed and stamped memorandum of association and the articles of association of the Company.
- c. The original signed Annual Reports [including digitally signed Annual Reports].
- d. Minutes of General Meetings, Board Meetings and various Committee Meetings.
- e. Register of Members along with Index [including Benpos as received from RTA].
- f. Foreign Register of Members, if any.
- g. Register of loans, guarantee, security and acquisition made by the Company.
- h. Register of investments not held in its own name by the Company, if any.
- i. Register of contracts with related party and contracts and Bodies etc. in which directors are interested.
- j. Register of Charges
- k. Registers of Renewed and duplicate share certificates.
- l. Register of Directors and Key Managerial Personnel.
- m. Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.
- n. Agreements relating to premises viz. Title Deeds/Lease Deeds/leave and license of owned premises/land and building, etc. and related Ledger / Register.
- o. Transcripts of the audio/video recordings of the post earnings/ quarterly calls by whatever names called, conducted physically or through digital means.
- p. Licenses and Permissions for the Company by Statutory Authorities, Central & State Government(s).
- q. Shareholders Agreements/ Joint Venture Agreements/Share Purchase Agreements.

##### **(ii) Documents which are to be maintained for at least eight financial years:**

- a. Books of account together with the vouchers relevant to any entry in such books of account.
- b. Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company (from the date of redemption of debentures or securities, as the case may be)
- c. Copies of all Annual Returns.
- d. E-forms filed with the Registrar of Companies.
- e. Disclosure of Interest received from the Directors of the Company in the manner prescribed.
- f. Attendance Registers, Notices, Agenda, Notes on Agenda, Postal Ballot and other related papers of General Meetings, Board Meetings and various Committee Meetings.
- g. Instrument creating a Charge or modifying a Charge, if any.
- h. Changes to the Memorandum of Association and the Articles of Association, if any.

- i. Register of deposits accepted or renewed, if any (from the financial year in which the latest entry is made in the register).
- j. Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for appeal, as the case may be.
- k. Employment /Personnel Record should be retained for a period of eight (8) years following cessation of employment in case of employees of the Company.
- l. Legal orders including but not limited to 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, relating to the premises of the Company.
- m. Structured Digital Database as per SEBI (Prohibition of Insider Trading) Regulations, 2015 (“**Insider Trading Regulations**”), after completion of the relevant transactions and in the event of receipt of any information from any regulator / SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings. However, the disclosures made under Chapter III of the Insider Trading Regulations shall be preserved for a minimum period of five years.

**(iii) Documents with preservation periods other than those mentioned in (i) and (ii) above:**

All those documents which are required to be preserved in accordance with the provisions of applicable laws for a preservation period of other than those mentioned in (i) & (ii) above shall be preserved accordingly. Notwithstanding the categories mentioned above, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi-judicial authorities, mediation and alternate disputes, industrial disputes, etc. are preserved according to specific needs and even beyond the prescribed period. Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc., from government/ statutory bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

## **5. Archival Policy**

In accordance with the provisions of the SEBI Listing Regulations, the Company shall ensure that disclosure of all events and information provided to the Stock Exchanges as per regulation 30 of SEBI Listing Regulations shall be hosted on the Company’s website for a period of five years.

The Company shall also ensure that the investor presentation and audio video recordings conducted physically or through electronic means shall be hosted on the website for a period of two years as per regulation 46 of SEBI Listing Regulations.

Subsequently, such disclosures shall be removed from the Company’s website. Thereafter the same shall be archived so as to be available for retrieval for a further period of two years by storing the same on suitable media. Thereafter the said information, documents, records may be destroyed as per the Policy.

All information required to be uploaded on the Company’s website in pursuance of any other statute, legislation or regulation shall be hosted on the Company’s website, in the form, manner and for such period as may be mandated by that statute, legislation or regulation etc. In cases where the concerned statute, legislation or regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of one year from the date of uploading or more if deemed necessary by the Chief Financial Officer, Company Secretary or respective functional heads.

## **6. Disposal and destruction of records**

After the expiry of the statutory retention period, the preserved Documents may be destroyed. Destruction of Documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant. Any destruction of records, will be done under supervision of the Chief Financial Officer, Company Secretary or respective functional heads.

This applies to both physical and Electronic Documents. The Documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shred, or otherwise render unreadable, confidential paper records; or
- c. Delete or destroy electronically stored data.

7. Review and amendment

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.

In the event of any conflict between the statutory enactments (as may be periodically amended) and the provisions of this Policy, the statutory enactments shall prevail, and this Policy shall be modified in due course to make it consistent with law.

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