

# **DESH BHAGAT SKILLS LIMITED**

## **Policy on Preservation of Documents**

### **1. INTRODUCTION**

The Board of Directors (“**the Board**”) of DESH BHAGAT SKILLS LIMITED (“**the Company**”) has adopted this Policy on Preservation of Documents (“**this Policy**”).

This policy is framed as per the requirements of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) and shall be effective from 24.02.2025.

### **2. OBJECTIVE**

This Policy contains guidelines for identifying Documents that need to be maintained, the period of preservation of such Documents and its destruction/disposal. This Policy aims to provide efficient and systematic control on the periodicity and destruction of business-related Documents.

### **3. DEFINITIONS**

For the purposes of this policy, the following definitions apply:

“**Act**” means the Companies Act, 2013 and Rules made there under, as amended from time to time.

“**Document**” means any documentary material in either paper or electronic form, generated or received by the Company including but not limited to an electronic document, CD-ROM, hard disk, email, microfilm, X-ray film, video tape, floppy disk, USB memory etc.

“**Register**” means the register of various documents maintained by the Company on paper or in electronic form of various documents.

“**Secretary**” as defined under Section 2(24) of the Companies Act, 2013 means a Company Secretary as defined in clause (c) of sub-section (1) of Section 2 of the Company Secretaries Act, 1980 who is appointed by a Company to perform the functions of a Company Secretary;

### **4. SCOPE**

This Policy applies to all departments and business functions of the Company but does not apply to personal or non-business information.

### **5. PERIODICITY OF PRESERVATION OF DOCUMENTS**

The below guidelines shall be followed for the proper preservation of documents.

Document Category	Document Type	Preservation period	Mode of preservation
Company Operations	<ul style="list-style-type: none"> <li>• Memorandum / Articles of Association</li> <li>• Certificate of Incorporation</li> <li>• Certificate of Commencement of Business</li> <li>• Licenses, certificates, approvals and other such documents issued by Central/State Government and any other statutory and/or regulatory body</li> <li>• Orders, judgments of judicial authorities</li> <li>• Policies and Codes of the Com</li> <li>• Other related Documents</li> </ul>	Permanent	Physical and/or electronically
Tax and Finance records	<ul style="list-style-type: none"> <li>• Books of accounts, including inter-alia, financial statements, vouchers relevant to entry in books of accounts, audit records, invoices, expense records, bank records etc. in accordance with the applicable provisions of Companies Act, 2013, Income tax Act, and any other applicable laws.</li> <li>• Application/correspondence with various Direct and Indirect tax authorities</li> <li>• Excise invoices/bills/challan</li> <li>• Returns and Assessment Records</li> <li>• Sales Tax documents</li> <li>• Loan-related Documents</li> <li>• Documents related to all other taxes and duties</li> <li>• Other Related Documents</li> </ul>	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/or electronically
Secretarial records	<ul style="list-style-type: none"> <li>• Statutory Registers, returns, forms as required under various applicable laws/ statutes / regulations etc.</li> <li>• Notice, agenda and notes to agenda of meetings of the Board and its Committees</li> <li>• Minutes of the meetings of the Board of Directors, Committees and shareholders</li> <li>• Office copies of Notices, scrutinizer's report and other documents related to meetings of shareholders/ creditors of the Company</li> </ul>	Permanent	Physical and/or electronically

Document Category	Document type	Preservation period	Mode of preservation
	<ul style="list-style-type: none"> <li>• Attendance registers of the meetings of the Board and its Committees Statutory filings with the Stock Exchanges, SEBI, MCA, RBI and any other statutory/regulatory authority</li> <li>• Applications and approvals for issuance and listing of securities</li> <li>• Press releases, publicly filed documents</li> <li>• Land title deeds/ documents/ receipts</li> <li>• Agreements pertaining to securities</li> <li>• Other related Documents relating to litigations etc.</li> </ul>	To be preserved until the matter is resolved/ settled	
	Documents specified to be preserved for eight financial years under any applicable law/regulation/statute etc.	Eight financial years	Physical and/ or electronically
	Details relating to unclaimed/unpaid dividend	Seven years	Physical and/ or electronically
Legal	Executed copies of contracts/ agreements entered by the Company	Eight years beyond the life of the contract or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically

	<p>Case files of all disputes/recovery with different authorities.</p> <p>Registration/renewal Documents</p> <p>Documents relating to the development of intellectual property</p> <p>All Documents containing trade secrets</p> <ul style="list-style-type: none"> <li>• Original and supplementary license</li> <li>• Other related Documents</li> </ul>	Permanent	Physical and/or electronically
	Documents are relevant to litigation or any potential litigation (dispute that may result in litigation), claim, audit, investigation or enforcement action.	Until the Legal Department of the Company determines in that such Documents are no longer needed.	Physical and/or electronically
Production, purchases related records	<ul style="list-style-type: none"> <li>• Production procedures, production data, system based records, MIS, rejections etc.</li> <li>• Other production-related records required to be maintained under any applicable law/statute etc.</li> <li>• Purchase orders, annual contracts, quotations and comparative quotation analysis etc.</li> <li>• Bill of entry/bill of lading, shipping bill, airway bill etc.</li> </ul>	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/or electronically
Strategy/projects	<ul style="list-style-type: none"> <li>• Documents relating to projects</li> <li>• Statistical information, negotiation drafts, analysis reports etc.</li> <li>• Other related documents</li> </ul>	Five years beyond the life of the project/ assignment or such period as may be specified under applicable law /statute etc.	Physical and/or electronically

Employment / Personnel records	<ul style="list-style-type: none"> <li>• Documents relating to individual personnel records, payroll, salary history, bonuses, performance reviews etc.</li> <li>• Other personnel related documents</li> </ul>	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Information Technology	<ul style="list-style-type: none"> <li>• Documents in relation to procurement of IT hardware, software, licenses etc.</li> <li>• Operations &amp; User Manuals</li> <li>• Licence and Information Security Register</li> <li>• Server logs</li> <li>• Disaster Recovery Site logs</li> <li>• Inventory of back up data</li> <li>• Other related Documents</li> </ul>	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Marketing and Sales records	<ul style="list-style-type: none"> <li>• Sales &amp; Marketing policies</li> <li>• Debit Note/Credit Notes</li> <li>• Credit Appraisal Forms &amp; Ratings</li> <li>• Agreements with Agents</li> <li>• Collection Advices</li> <li>• Related MIS</li> <li>• Other related Documents</li> </ul>	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
International	Documents governed by the jurisdiction of foreign country	As per requirement of concerned country	Physical and/ or electronically
Incidental or other business related information	<ul style="list-style-type: none"> <li>• Drafts and preliminary versions of documents superseded by work paper and other transitory information</li> </ul>	As long as it remains relevant	Physical and/ or electronically
	<ul style="list-style-type: none"> <li>• Any other Document relating to the business of the Company</li> </ul>	180 days or as long as it remains current	Physical and/ or electronically

***Where the preservation period of Documents is not included in the above identified categories, such period shall be determined by the application of the general guidelines affecting Document preservation identified in this Policy, as well as any other pertinent factors.***

***Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department.***

## **6. ACCESSIBILITY AND RETRIEVAL OF RECORDS**

### **6.1 Retention of Physical records**

Preserved records shall be kept confidentially, securely with access control with ease of retrieval, whether in-house or externally. Measures should be taken for physical security of the records maintained like selection of area of record room, firefighting device, access control, etc.

### **6.2 Retention of Electronic Records**

Wherever allowed/required by any law/statute, records may be maintained in electronic form. In case records and documents are maintained in electronic form, all the requirements relating to Information Technology Act, 2000, including any statutory amendment(s) or modification(s) thereto, shall be adhered to.

In case of switch-over to another electronic system, it should be ensured that all the records in the old electronic system should be migrated to new electronic system and all old records are accessible in the new system.

## **7. DESTRUCTION OF DOCUMENTS**

The Documents should be destroyed at the end of the preservation period specified under Clause 5 of this Policy. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by employees who are disposing the Documents. Electronic information, including e-mails that are no longer required to be retained, must be purged using appropriate techniques which ensure that the data cannot be reconstructed from the storage media on which it resided. Records stored on magnetic media must be destroyed by reformatting at least once. However, the backup copies of the records must also be destroyed.

## **8. RESPONSIBILITY**

Functional heads of respective Units shall be responsible for monitoring the implementation of this Policy.

## **9. REVIEW AND AMENDMENT**

The Board of Directors shall review this Policy as and when it deems necessary and approve changes, if any required from time to time in line with the statutory provisions. Any change to this Policy requires approval of the Board of Directors.

## **10. INTERPRETATION**

In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.