



Ahluwalia Contracts (India) Limited

Engineering, Designing & Construction

DOCUMENT PRESERVATION & ARCHIVAL POLICY OF AHLUWALIA CONTRACTS (INDIA) LIMITED

This Document Preservation & Archival Policy (“**Policy**”), as adopted by the Board of Directors (“**Board**”) deals with the preservation/retention and archival of the corporate records and public disclosures of Ahluwalia Contracts (India) Limited (“ACIL”).

The Company is required to maintain certain types of corporate records for a specified period of time under applicable corporate/ securities laws, including but not limited to the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 and the Companies Act, 2013 (“**Applicable Laws**”). There are certain types of records that need to be retained for a specified period of time, as identified below:

- a) Documents to be preserved permanently: The documents listed in **Schedule-I** along with any other documents required legally shall be maintained and preserved permanently by the Company.
- b) Documents to be preserved for no less than eight (8) years: The documents listed in **Schedule- II** along with any other documents required legally shall be maintained and preserved for no less than eight (8) years by the Company.
- c) Documents to be preserved for no less than three (3) years: All communications to the Board and committees of the Board with regard to calling of meetings.

Records may be preserved for longer periods of time where required under any other Applicable Laws.

Similarly, if an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise. This Policy will be reviewed periodically by the senior management and amendments may be made, subject to approval of the Board, if and when required. The senior management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

The document retention shall also take into account the requirements for business continuity plan in place from time to time.

Limitation, Review and Amendment

In the event of any conflict between the provisions of this Policy and of the Applicable Laws, the provisions of Applicable Laws shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Laws shall automatically apply to this Policy.



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The Board may review and amend this Policy from time to time, as may be deemed necessary.

Disposal and Destruction of Records

SCHEDULE-I: DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

SL	DOCUMENTS
1	Incorporation documents
2	Memorandum and articles of association
3	Register of members along with the index
4	Register of renewed and duplicate share certificates
5	Register of charges
6	Register of loans, guarantees, security and acquisition
7	Register of investments made by the Company not held in its name
8	Register of contracts or arrangements in which directors are interested
9	Foreign register of members
10	Minutes Book for general meeting and resolutions passed by postal ballot, and resolutions passed by circulation.
11	Minutes book for meetings of the Board and Committees constituted by it.

SCHEDULE-II: DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF RELEVANT TRANSACTION

SL	DOCUMENTS
1	Books of account including relevant books and papers and financial
2	Disclosures/ notices by a director of his interest
3	Register of deposits
4	Instrument creating a charge or modification
5	Annual return and copies of all certificates and documents required to be annexed thereto
6	Register of Shareholders
7	The attendance register of Board & Committee Meetings
8	Tax Records
9	Employment / personal Records
10	Relevant Tenders Documents
11	Legal documents including but not limited to contracts, legal opinions, pleadings Orders, Judgments and Awards
12	Property Documents
13	Press Release
14	Investor Presentation



MODE OF MAINTENANCE

The Company shall maintain these records either in physical or in Electronic Form. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

Modes of preservation: - The Documents may be preserved in as under:

Sl.	Mode of Documents (Records)
1	Physical form, and/or in
2	Electronic Form
3	The officer of the Company required to preserve the Document shall be an Authorised Person, who is generally expected to observe the compliance of requirements of Applicable Law.
4	The preservation of Documents should be such as to ensure that there is no tampering, alteration and destruction. Nothing shall be done which endangers the content, authenticity, utility or accessibility of the Documents.
5	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 to prohibit unauthorized access

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.

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.

CUSTODY OF THE DOCUMENTS

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tender's 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 Compact Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorize such other person as it may deem fit as the Authorised Person.

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

AUTHORITY TO MAKE ALTERATIONS TO THE POLICY



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The Board is authorized to make such alterations to this Policy as and when considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the relevant Acts and Regulations.

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.

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

Sl.	Documents
1	Recycle non-confidential paper records;
2	Shred or otherwise render unreadable confidential paper records; or
3	Delete or destroy electronically stored data

ADOPTION & AMENDED DATES

The Board approved and adopted the Policy for maintain of all Statutory Registers/ Documents in its meeting held on May 30, 2014.

The Policy was reviewed on February 14, 2026