

## POLICY ON PRESERVATION OF DOCUMENTS

Under Regulation 9 of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015

### 1. PREFACE

The purpose of this document is to present a Policy of **ELIN ELECTRONICS LIMITED** (the “Company”) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”). As per Regulation 9 of the Regulations, every listed company is required to have a policy for preservation of documents approved by its Board of Directors, classifying them as documents whose preservation shall be permanent in nature and documents with preservation period of not less than eight years after completion of relevant transactions.

Accordingly, the Board of Directors of the Company has approved this policy for preservation of documents/ records maintained by the Company either in physical mode or electronic mode on 09 October 2021.

### 2. PURPOSE

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

### 3. DEFINITIONS

- a) “Act” means the Companies Act, 2013 and Companies Act, 1956.
- b) “Preservation” is maintenance of documents, files and records in usable form and to prevent from being altered, damaged or destroyed.
- c) “Records” means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.
- d) “Company” means **ELIN ELECTRONICS LIMITED**
- e) “Board of Directors” or “Board” means the Board of Directors of the Company, as constituted from time to time.
- f) “Policy” means policy on Preservation of records.
- g) “Listing Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.

### 4. POLICY

#### a) Legislative Framework and Standards

- Companies Act, 2013.
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

#### b) Maintenance of Records

- The content and essential characteristics of digital records must remain unchanged through preservation.
- Digital records can be maintained in forms such as emails, web pages or database records, plus scanned versions of paper records that have been digitised in business processes.

- Physical records to be maintained in books and files and shall be duly numbered along with month and year clearly marked therein on the books and files.
- All digital and physical records to be saved at the registered / administrative office of the Company and no physical records can be migrated without permission of Company Secretary/Directors/Authorised persons.
- A record of all physical records migrated from the registered office/administrative office of the company shall be duly entered into a register/electronic record along with the signatures of the person to whom the documents had been handed over and the Company Secretary / Directors / Authorised persons
- A reproduction of any original record on microfilm or on any other medium shall be certified by a Director or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.

**c) Disposal and Destruction of Records**

- All records mentioned in **Annexure A** 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 thereafter the records can be destroyed.
- All records mentioned in **Annexure B** need to be preserved by the Company permanently during the entire life of the Company.
- The Company shall store all events or information which has been disclosed to stock exchange(s) under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and which shall be hosted on the website of the Company for a minimum period of five years and thereafter the same shall be archived so as to be available for retrieval for such period as may be decided by the Managing Director of the Company.
- Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.
- The Company shall maintain a register as specified in **Annexure C**, wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.

**5. AMENDMENT**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit or from time to time and the decision of the Board in this respect shall be final and binding.

**6. REVIEW**

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to necessary approval of the Board of Directors.

<b>Sl. No.</b>	<b>Annexure A</b>	<b>Annexure B</b>
1	Proxy Forms	Certificate of Incorporation
2	Representation Letters	Certificate of Change in 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/KMPs	Counter folios of Share Certificates issued from time to time
6	Board Agenda and supporting papers	Minutes Book (Board, Committee, General Meeting)
7	Office copies of Notices of General Meeting and related papers	Circular Resolutions and Certified Copies of Resolutions passed at board meetings
8	Quarterly and Annual Financial Statements (including Board Report and Auditors' Report)	Licenses and Permits
9	NSDL/CDSL Files	Statutory Registers
10	Declaration by Directors u/s 164 of the Companies Act, 2013	Scrutinizers' Report
11	Declaration by the Directors u/s 184 of the Companies Act, 2013	Register of Members
12	All documents under listing agreement, documents/communication with stock exchanges	Index of Members
13	Notice of General Meeting and Board Meeting	Listing Agreement with Stock Exchanges
14	Documents on which common seal of the company is affixed	Central/State Government approvals received
15	Advertisements published	Any other Document / Information / Record as per the provisions of any other applicable Law or Regulation to the extent applicable to the Company
16	Disclosures under SEBI (Prevention of Insider Trading) Regulations, 2015 and SEBI (Substantial Acquisition of shares and Takeover) Regulations, 2011	

**ANNEXURE C**

Sl. No.	Particulars of documents destroyed	Date and mode of destruction with the initials of Secretary or other authorised Person

For Elin Electronics Limited

*Kamaldeep*

Authorised Signatory/Director