

## **PREFACE**

According to the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, The listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:

- (a) documents whose preservation shall be permanent in nature;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions:  
Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

In accordance with the above Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Policy for preservation of documents (The Policy) has been framed by the Board of Directors of the Company in their Board Meeting held on 22<sup>nd</sup> May, 2018 to aid the employees in handling the Documents efficiently. This Policy not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

## **OBJECTIVE OF THE POLICY**

The objective of this policy is to aid the employees in handling the Documents efficiently and classify the documents, records and registers of the Company which are required:

- (a) to be preserved permanently and
- (b) to be preserved for a period of not less than 8 years.

## **DEFINITION**

“**Act**” means the Companies Act, 2013.

“**Applicable Law**” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

“**Authorized Person**” means any person duly authorized by the Board.

“**Board**” means the Board of Directors of the Company or its Committee.

“**Company**” means Ace Integrated Solutions Limited.

“**Current Document(s)**” means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

**“Document(s)”** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, 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, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

**“Electronic Record(s)”** means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.

**“Electronic Form”** means any contemporaneous 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.

**“Maintenance”** means keeping Documents, either physically or in Electronic Form.

**“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

**“Regulations”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

## **CLASSIFICATION**

The preservation of Documents shall be done in the following manner:

- (a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period prescribed by Applicable Law.
- (b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is covered under the definition of current documents.

An indicative list of the Documents and the time-frame of their preservation is provided in **Annexure- I**.

## **MODES OF PRESERVATION**

The Documents may be preserved in:-

- (a) Physical form or
- (b) Electronic Form

The officer of the Company required to preserve the Document shall be Authorized Person who has to observe the compliance of requirements of Applicable Law and this policy.

### **CUSTODY OF THE DOCUMENTS**

Subject to the Applicable Law, the custody of the Documents shall be with the authorized person, Where the authorized person tenders 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 Disc, other storage devices or such other Documents and devices in his possession and such authorized person taking possession of documents needs to change the password.

### **AUTHORITY FOR APPROVAL OF POLICY**

The Board shall have the authority for approval of this policy in pursuance to the Regulations.

### **DESTRUCTION OF DOCUMENTS**

1. Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.
2. The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice are listed in **Annexure II**.

### **CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED**

1. The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
2. This will be done after obtaining prior approval of the Board

### **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.

### **POLICY REVIEW**

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

## **AMENDEMENT**

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.