



SMARTEN POWER SYSTEMS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements)
Listing Regulations, 2015]

(Adopted by Board of Directors in its meeting held on 12/12/2024. Effective from 12/12/2024.)

SMARTEN POWER SYSTEMS LIMITED

CIN: U31401HR2014PLC052897

Registered Office:

374, 1st Floor Pace City-2, Sector-37,
Gurgaon, Haryana, India, 122001



POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE:

This Policy has been framed in compliance with the provisions of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Listing Regulations, 2015, as amended (hereinafter referred to as “**Listing Regulations**”) which requires every listed company to have a policy on preservation of documents, approved by its Board of Directors, classifying them into at least two categories:

- (i) Documents whose preservation shall be permanent in nature;
- (ii) Documents with preservation period of not less than eight years after completion of the relevant transactions

2. TITLE AND COMMENCEMENT:

This Policy is called “Policy on preservation of documents” or the “Policy” and shall come into force from 12/12/2024

This Policy has been approved by the Board in its meeting held on 12/12/2024 and the same shall come into effect from 12/12/2024 or from such other date as per the Listing Regulations coming into effect and applicable.

3. OBJECTIVES OF THE POLICY:

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Listing Regulations and as per Policy framed in compliance with the Listing Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same. The major objectives of the policy are:

- (i) To identify statutory records to be preserved.
- (ii) To identify records to be maintained either for a period of eight years or permanently.
- (iii) To decide the mode of preserving the documents, whether in physical form or in electronic form.
- (iv) To decide the procedure to destroy the documents after eight years or other applicable period,
- (v) To help employees understanding their obligations in retaining and preserving the documents and records.

4. DEFINITIONS:

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

“**Register**” means a register maintained under the Companies Act, 2013 or the SEBI Act.

“**Listing Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

“**SEBI**” means Securities and Exchange Board of India constituted under SEBI Act, 1992 or similar authority.

“**Company**” means Smarten Power Systems Limited.



“**Documents**” means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.

“**Maintenance**” means keeping documents, either physically or in electronic form.

“**Electronic Form**” with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

“**Financial Year**” shall have the same meaning as assigned to it under Section 2(41) of the Companies Act, 2013.

“**Key Managerial Personnel**” or “**KMP**” shall have the same meaning as assigned to it under Section 2(51) of the Companies Act, 2013.

“**Policy**” or “**This Policy**” means, “**Policy on Preservation of Documents**”.

“**Preservation**” means to keep the documents preventing them from being altered, damaged or destroyed.

The words importing the singular include the plural and vice versa and shall be interpreted in the wide sense in spirit of this Policy.

5. CLASSIFICATION OF DOCUMENTS :

Documents and Records of the Company required to be preserved under the Listing Regulations shall be classified in the following two categories as below:

- (a) Documents to be preserved permanently and
- (b) Documents to be preserved for not less than eight years.

The above mentioned documents can be preserved in electronic or physical mode.

Accordingly, the Company has classified the preservation of documents to be done in the following manner:

- (a) Documents that needs to be preserved and retained permanently and
- (b) Documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Listing Regulations.

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

6. DESTRUCTION OF RECORDS:

- (i) The preserved records must undergo an annual review to identify those due for disposal.
- (ii) Documents should be destroyed once their minimum retention period ends, unless they are needed for litigation, audits, or similar purposes.
- (iii) Destruction ensures that neither the organization nor any other entity can access the document or any part of it.
- (iv) If the organization is or expects to be involved in litigation, audits, or similar activities by statutory or regulatory bodies, the destruction of records may be temporarily postponed.



7. ARCHIVAL POLICY:

All such events or information so disclosed on the website of the Company in pursuance to Regulation 30 of the Listing Regulations shall be archived after the expiry of the five years from the date of such posting and moved to the location or place under - “Historic Material Events/ Information”. [K&K **Comment:** Company team to confirm the location of such documents.]

The events/ information so archived under “Historic Material Events/ Information” shall be preserved for a further period of three years or till the time such events or information are resolved or closed, whichever is later.

8. CUSTODY OF DOCUMENTS:

The Company official responsible for document preservation shall be an Authorized Person, typically tasked with ensuring compliance with statutory requirements under relevant laws. Key Managerial Persons shall have custody of the documents. If the Authorized Key Managerial Person resigns or is transferred between Company locations, they must hand over all relevant documents, along with any keys, access controls, passwords, company discs, storage devices, or other such materials in their possession, according to the Policy. The Board may appoint another suitable individual as the Authorized Person if necessary.

9. LIMITATION AND AMENDMENT

In the event of any conflict between the provisions of this Policy and of the Companies Act, 2013 (and the rules framed thereunder) or the Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy.

Any subsequent amendment / modification in the Listing Regulations, Companies Act, 2013 (and the rules framed thereunder) and/or applicable laws in this regard shall be deemed to be covered under this Policy.

10. DISCLOSURE:

This Policy will be disseminated to all operational employees and other relevant individuals within the Company, and it will also be made available on the Company’s website i.e., <https://www.smartenpowersystems.com>.



ANNEXURE-A

A. The Company shall maintain the follows documents on a permanent basis:

- (i) Documents filed with ROC for incorporation of the Company.
- (ii) Certificate of incorporation including all fresh certificates of incorporation, certificate of commencement of business, if any, and common seal.
- (iii) The original signed and stamped MOA and AOA.
- (iv) Minutes of general meetings, board meeting and various committee meetings.
- (v) Register of member's along with index.
- (vi) Foreign Register of members, if any.
- (vii) Register of debenture holder (including foreign register of debentures) on register of any other securities issued by the Company.
- (viii) Register of loans, guarantee, security and acquisition made by the Company;
- (ix) Register of investments not held in its own name by the Company, if any;
- (x) Register of contracts-with related party and contracts and bodies etc. in which directors are interested;
- (xi) Register of charges;
- (xii) Registers of renewed and duplicate share certificates;
- (xiii) Register of directors and KMP;
- (xiv) Register of significant beneficial owners.
- (xv) Payroll registers;
- (xvi) PF, Bonus, Gratuity and other Statutory Registrations, Returns and Records;
- (xvii) Licenses Issued and permissions by Regulatory Authorities.
- (xviii) Intellectual property documents shall include, but shall not be limited to copyrights, trademarks, patents, and industrial designs. Intellectual property rights that are owed by the Company shall be retained by the Company permanently.
- (xix) Any other records / Documents which will have a permanent value for the company event after the expiry of the of legal preservations period



B. Documents to be maintained for at least eight financial years:

- (i) Books of accounts together with the vouchers relevant to any entry in such books of accounts;
- (ii) Copies of all annual returns
- (iii) Disclosure of interest received from the Directors of the Company in the manner prescribed;
- (iv) Attendance registers, notices, notes on agenda and other related papers of general meetings, board meetings and various committee meetings;
- (v) Instrument creating a charge or modifying a charge, if any;
- (vi) Changes to the memorandum of association and the articles of association, if any;
- (vii) Register of deposits accepted or renewed, if any
- (viii) Tax Record.
- (ix) Employment/personnel record in case of employees of the Company;
- (x) Relevant marketing and sales documents;
- (xi) Press releases;
- (xii) Legal documents including but not limited to contracts, 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, documents relating to property matters;
- (xiii) Disclosures under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
- (xiv) Documents on which the common seal of the Company has been affixed (other than those which are prescribed to preserve for a longer period of time).
- (xv) Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years.