

## **PREAMBLE**

This Policy has been framed in accordance with the requirements of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI Regulations**”).

The Board of Directors (“**Board**”) of “**P. E. Analytics Limited**” (“**Company**”) has approved the following policy (“**The Policy**”) of the Company for preservation of Documents/records maintained by the Company either in physical mode or Electronic mode (hereinafter referred to as “**Documents**”).

The purpose of this policy is to ensure that all necessary documents of the Company are adequately protected and maintained/preserved as per the statutory and regulatory requirements. Further, documents of the Company which are no longer needed may be destroyed after following due process in this regard. 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.

## **DEFINITIONS**

Unless the context otherwise requires, the words, terms, expressions and derivations used in the policy shall have the meaning given in the SEBI Regulations, Companies Act, 2013 or any other Act(s), Rules and Regulations mentioned in this policy:

- a) “**Board of Directors**” or “**Board**” shall mean the Board of Directors of P. E. Analytics Limited (including duly authorized Committee thereof), as constituted from time to time;
- b) “**Company**” shall mean P. E. Analytics Limited;
- c) “**Companies Act**” shall mean the Companies Act, 2013 and the rules made there under;
- d) “**Document**” includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- e) “**Financial Year**” shall have the same meaning described under the Act;
- f) “**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;
- g) “**Key Managerial Personnel**” or “**KMP**” shall have the same meaning ascribed to it under the Act;
- h) “**Policy**” means Policy on Preservation of Documents of the Company;
- i) “**SEBI Regulations**” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time;

## **POLICY FOR PRESERVATION OF DOCUMENTS**

- I. Documents and records of the Company required to be maintained under the SEBI Regulations shall be classified in two categories as below:
  - a) Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;
  - b) Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions, subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.
- II. The Listing documents and records in physical form shall be in the custody of the Company Secretary.
- III. The Company may keep the Listing documents and records as specified above in electronic mode.
- IV. The Register and share transfer Agent shall ensure that the correct procedures are followed for maintenance of the Listing records required to be maintained by them.

## **REGISTER OF DOCUMENTS DESTROYED**

Respective Heads of Department responsible for preservation of related documents may destroy such documents, which are no longer required as per this policy.

## **COMMUNICATION OF THIS POLICY**

The Policy shall be published on the website of the Company and shall be communicated to all concerned to ensure the effective implementation thereof.

## **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.

## **DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE**

### **A) Companies Act, 2013:**

- 1) Memorandum and Articles of Association as amended from time to time
- 2) Register of Contracts
- 3) Register of Directors and KMPs and the securities held by them
- 4) Register of Loans and Investments made by the Company
- 5) Register and Index of Members
- 6) Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots
- 7) Resolutions passed by Circulation
- 8) Various Forms and returns filed with the Authorities
- 9) Audited Financial Statements.

**B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:**

- 1) Listing Agreement executed with the Exchanges.
- 2) Trading approval relating to listing of securities.
- 3) Offer documents for Public Issues and Private placement of securities filed with Securities and Exchange Board of India.

**C) Depositories Act:**

- 1) Confirmation of all Corporate Actions in respect of allotment of securities.
- 2) Intimation on allotment of International Securities Identification Numbers (ISIN) for securities issued.

**D) Others:**

- 1) Register of Records and Documents destroyed.

**DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS UNLESS SPECIFIED UNDER ANY OTHER ANY ACT OR RULES, FOR A LONGER DURATION:**

**A) Companies Act, 2013:**

- 1) Register of Buy-back of Securities from the date of completion of buy-back
- 2) Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots
- 3) Register of Charges from the date of satisfaction of respective charge
- 4) Register of Debentures and Debenture Trust Deed from the date of its redemption
- 5) Books of Accounts including vouchers and bills
- 6) Annual Returns together with the Annexure
- 7) Register of Transfer and Transmission of shares/Debentures and other securities
- 8) Scrutinizer's Report on Postal Ballot and AGM
- 9) Documents relating to appointment of Managerial Personnel
- 10) Dividend reconciliation statement till the time the dividend is transferred to IEPF

**B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:**

- 1) All reports filed with the stock exchanges from time to time
- 2) All disclosure of various events and Press Releases
- 3) Intimations of Board Meetings

**C) Documents filed with Stock Exchanges under SEBI Regulations:**

All disclosures and intimations filed under:

- 1) SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011
- 2) SEBI (Prohibition of Insider Trading) Regulations, 2015
- 3) All disclosures and intimations filed under SEBI (Share Based Employee Benefit) Regulation, 2014 and SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines 1999
- 4) Digital Database maintained under SEBI (Prohibition of Insider Trading) Regulations, 2015