

**POLICY ON
PRESERVATION OF DOCUMENTS
&
ARCHIVAL OF DOCUMENTS
IN THE WEBSITE**

OBJECTONE INFORMATION SYSTEMS LIMITED
CIN:L31300TG1996PLC023119
Registered Office: 8-3-988/34/7/2/1 & 2, Kamalapuri Colony,
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OBJECTIVE

The objective of this Policy is to lay down the principles for the preservation of documents and records of the Company.

REGULATORY FRAMEWORK

The Securities and Exchange Board of India has on September 2, 2015 notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Regulations") which shall come into effect on December 1, 2015.

Regulation 9 of the SEBI Regulations requires listed entities to have a Policy on Preservation of documents approved by its Board of Directors, classifying the documents in at-least two categories, which are 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.

Accordingly, this policy is framed as per the requirements of the SEBI Regulations.

DEFINITIONS

In this policy, unless the context otherwise requires –

- (a) "Act" means the Companies Act, 2013 and the rules made there under, as amended from time to time.
- (b) "Listing Regulations" shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- (c) "Company" means Objectone Information Systems Limited.
- (d) "Archival" means accumulation/storage of historical records on server/network or at a physical place.
- (e) "Document" includes all summons, notices, requisitions, orders, declarations, forms and registers, agreements and memorandum of understanding, papers, certificates, records, contracts, files, books, letters, tapes, CDs, DVDs, electronic storage devices, etc., 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;

- (f) "Maintenance" means keeping documents, either physically or in Electronic Form.
- (g) "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- (h) "Key Managerial Personnel" or "KMP" shall have the same meaning described to it under the Act.
- (i) "Board" or "Board of Directors" shall mean the Board of Directors (including the Board committees) of the Company, as may be re-constituted from time to time.
- (j) "Financial Year" shall have the same meaning described to it under the Act.
- (k) "Books of Accounts" includes records maintained in respect of –
 - i. all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place
 - ii. All sales and purchases of goods and services by the Company
 - iii. The assets and liabilities of the Company; and
 - iv. The items of cost as may be prescribed under section 148 of the Act in case the Company belongs to any class of companies specified under that section.
- (l) "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.
- (m) "Register" means documents and records required to be maintained under:
 - i. The Companies Act 2013 and Rules thereunder
 - ii. SEBI Regulations
 - iii. Secretarial Standards
 - iv. Any other law for the time being in force

All other words and expressions used but not defined in this policy but defined in the Act, the SEBI Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and/ or the rules and regulations made thereunder shall have the same

meaning as respectively assigned to them in such acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

APPLICABILITY

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The documents not covered under this policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

MODE OF PRESERVATION

The company shall keep the documents in electronic mode or physical mode and in such manner as the Board of Directors may deem fit such that the records are maintained in accordance with SEBI (LODR) Regulations, 2015 and Companies Act, 2013 and rules and regulations made thereunder.

ROLES & RESPONSIBILITIES

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of functions falling under the charge of each of them, in terms of this Policy.

Where a particular authorised person tenders his/ her resignation or is transferred from one location of the Company to another, such person shall, before such resignation or transfer becoming effective, hand over, to his/ her successor, all the relevant documents (whether in electronic form or otherwise) in his custody pursuant to this Policy together with any relevant passwords, lock and key, and any devices in his/ her possession used to store such documents.

PROVISION WITH REGARD TO PRESERVATION OF DOCUMENTS UNDER VARIOUS LAWS

Documents whose preservation shall be permanent

1. Documents and information filed with ROC for Incorporation of the Company
2. Common seal, certificate of incorporation and certificate of change of name, if any.
3. Certificate for commencement of business, if any

4. Memorandum of Association and Articles of Association as amended from time to time
5. Agreements made by the Company with the Stock Exchanges and Depositories, etc.
6. Minutes Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013 and the Regulation
7. Cancelled Share certificates
8. Licenses , Certificate and permissions obtained from any statutory authority
9. Order from Courts and any other regulatory authorities
10. Statutory registers required to be maintained under various applicable laws
11. Statutory forms except for routine compliance
12. Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
13. Policies of the Company framed under the Companies Act, 2013 and various regulations from time to time.
14. Any other documents as may be required to be maintained in terms of applicable law(s) and preserved from time to time.

Documents with preservation period of not less than eight years

1. Books of account including relevant books and papers and financial statements
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 debenture holders , if any
7. Postal ballot forms
8. Correspondence with shareholders
9. Tax records
10. Disclosures – SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
11. Disclosures – SEBI (Prohibition of Insider Trading) Regulations, 2015
12. Protected Disclosures in writing or documented along with the results of investigation relating thereto (including the Investigation Report) as reported under the whistle-blower policy
13. Other statutory registers and documents maintained by the Company under various laws applicable to the Company or as prescribed by the Board from time to time.

DESTRUCTION OF DOCUMENTS

The documents which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads.

SUSPENSION OF DOCUMENTS DISPOSAL IN THE EVENT OF LITIGATION/CLAIMS:

In the event the Company is served with any notice for documents from any of the statutory authorities or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of such notice or litigation shall be suspended until such time the matter is settled, resolved or disposed off. The relevant authorised person shall be responsible for informing all relevant employees of the Company about suspension of further disposal of documents.

GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company from time to time.

REVIEW OF POLICY

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this Policy shall be approved by the Managing Director or the Chief Executive Officer of the Company as delegated by the Board of Directors of the Company.