Fabtech®
Technologies Cleanrooms Ltd.
(Formerly known as Fabtech Technologies Cleanrooms Private Limited)

POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

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POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

A Preamble

A policy on preservation of Documents would ensure safe keeping of the records and safeguard of the documents from getting mishandled, while at the same time avoiding overflow of inventory of documents. The Board of Directors has therefore formulated this policy in pursuance of the Companies Act, 2013 read with Secretarial Standards and Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the **"Listing Regulations"**), on preservation of the Documents to aid the Company in handling the documents efficiently.

The Company shall have a policy for preservation of documents (including through electronic mode), as approved by the Board, and disclose on its website certain events or information prescribed therein to the stock exchange. Such disclosures shall also be made available on the Company's website for certain periods as statutorily required.

Accordingly, the Board on July 25, 2024 has adopted the Preservation and Archival of Company's Documents ("**Policy**").

B Objective and scope

The objective of this Policy is to have a requisite framework for the preservation & archival of the Company's Documents, which facilitate:

a) identification of records that are to be maintained and preserved permanently;
b) identification of records that are to be maintained and preserved for a specific period of time;
c) dissemination of equal, adequate and timely information to the stakeholders through the website of the Company;
d) the stakeholders to track the performance of the Company over regular intervals of time and assess the current status of the Company;
e) accessibility of maintained Documents at all reasonable times;
f) deciding the mode of preservation of Documents, whether in physical form or in electronic form.

This Policy shall be disclosed on the Company's website www.fabtechcleanroom.com in order to inform the stakeholder to facilitate them to retrieve past information which is of statutory nature for a period as disclosed in the Policy.

C Definitions and Interpretation

In this Policy, words and expressions shall have the meaning assigned to them below:

"***Act***"	shall mean the Companies Act, 2013 and rules framed thereunder, notified by the Ministry of Corporate Affairs, Government of India, as amended from

	time to time;
"***Applicable Law***"	shall mean any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India ("**SEBI**") and Ministry of Corporate Affairs ("**MCA**");
"***Board***"	shall mean the Board of Directors of the Company;
"***Books of Accounts***"	shall mean and include records maintained in respect of— a) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place; b) all sales and purchases of goods and services by the company; c) the assets and liabilities of the company; and d) the items of cost as may be prescribed under section 148 of the Act in the case of a company which belongs to any class of companies specified under that section;
"***Company***"	shall mean Fabtech Technologies Cleanrooms Limited;
"***Directors***"	shall mean all the members of the Board of Directors of the Company, including the Independent Directors;
"***Documents***"	shall mean refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record, 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 by the Company either in physical mode or electronic mode, as required to be maintained under any law or regulation for the time being in force;
"***Electronic Form***"	shall mean any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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;
"***Listing Regulation***"	shall mean The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time;
"***Maintenance***"	shall mean keeping documents, either physically or in electronic form; and
"Preservation & Archival"	shall mean keeping in good order to prevent from being altered, damaged or

destroyed and reasonably accessible.

D Classification of Documents

1. The classification of the Documents for the purpose of preservation shall be done as under:

   a) where there is a period for which the Document is required to be preserved as per Applicable Law(s), for the period required thereunder.

   b) where the period for preservation of the Documents has not been prescribed under the Applicable Law(s), till such period those Documents have relevance with reference to any ongoing litigations, proceedings, complaints, disputes, contracts or any like matter.

2. The Documents whose preservation shall be permanent in nature in the archives of the Company are listed in **Annexure – A**.

3. The Documents whose preservation shall be for periods, not less than eight years after completion of relevant transaction and miscellaneous are listed in **Annexure – B**.

E Management of the Documents

A. The preservation of the Documents is managed to ensure that there is no tampering, alteration, destruction or any other action which would endanger the content, authenticity, utility and accessibility of the Documents.

B. The heads of the respective departments of the Company shall be responsible for maintenance of the Documents.

F Disposal and destruction of the Documents

1. The Documents specified in **Annexure B** 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 and departmental heads.

2. Disposal and destruction of the Documents will be done by the respective departments, post the required timeframe after the approval of department head. The activity is done by the delegated person as directed by the department head. The activity will be documented with information on date, time, name of the person approved & disposed and way of disposal.

3. Destruction of the Documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

4. The Documents may also be destroyed as follows:
   a) recycling of non-confidential papers;

b) shredding or otherwise rendering of unreadable confidential papers; and
c) deleting or destroying electronically stored data.

G Archival of Information

(i) Disclosure of events or information under Regulation 30(8) of the Listing Regulations.

a) All events or information disclosed under Regulation 30(8) of the Listing Regulations and any other Regulations to the Stock Exchanges on which the Company is listed and hosted on the Company's website shall be available on the Company's website for a period of five (5) years or for such period as may be mandated under law from the date of uploading of the same on the website. However, if the disclosure requires a longer storage, the same will be considered appropriately.

b) On a quarterly basis all announcements/ disclosures on the website of the Company would be moved to the archival folder after a period of five (5) years from the date on which such disclosures/ announcements were made. The archived folder would be available for a period of one (1) or two (2) years.

(ii) Disclosure under other statutes and legislations

a) All information required to be uploaded on the Company's website in pursuance of any other statute / legislation / regulation, shall be hosted on the Company's website, in the form, manner and for such period as may be mandated by that statute / legislation / regulation etc.

b) In cases where the concerned statute / legislation / regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of one (1) year from the date of uploading or more if deemed necessary.

H Removal of records from website

Any Documents, information, form, or return etc. disclosed on the Website may be removed or deleted from the website after such disclosure period as stated above.

I Archiving

Post the disclosure period, the records removed from the website shall be placed in electronic archives. Depending upon the criticality/ importance of records being removed, the Company may retain those records having long term value in the archives for permanent/ specified period storage and to suitably deal with the records accordingly.

J Modifications

Any changes in the Policy shall be approved by the Board. The Board shall have the right to withdraw and / or amend and / or modify 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 mandatory.

K General

Where the terms of this Policy differ from any existing or newly enacted law, rule, or regulation, the law, rule or regulation will take precedence over this Policy from the effective date of such law, rule or regulation.

For interpretation of this Policy, reference and reliance may be placed upon circulars/clarifications issued by the MCA, SEBI and/or any other authority.

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ANNEXURE – A

Preservation – Permanent in Nature

i.	Corporate Records
1.	Common Seal
2.	Registration Certificate
3.	Constitutional documents i.e. Memorandum and Articles of Association of the Company
4.	Affidavit from the subscribers to the memorandum and from person named as the first directors
5.	Minutes' Books of Board, General Meetings and Committees Meetings
6.	Statutory Registers, such as (a) Register of Renewed and Duplicate Share Certificate, and (b) Register of Charge,
7.	License and Permissions
8.	Statutory forms except for routine compliance
9.	Scrutinizers Report
10.	Register of Members
11.	Index of Members
12.	Audited Financial Statements
13.	Documents related to purchase of shares/investments in an entity
14.	Books and documents relating to issue of share certificate, including blank forms of share certificates
i.	Accounts and Finance
a)	Annual Audit Reports and Financial Statements
b)	Subsidiary's Account
c)	Internal/Cost audit Reports
d)	Compliance/Secretarial Audit Report
i.	Tax Records
1.	Tax Exemption and Related documents
2.	Tax Bills, receipts and payments
v.	Legal files and records
a)	Court Orders
b)	Business / Joint Venture / Sales Purchase Agreement / Loan / Lease Agreements
c)	Trade Mark / Copy Rights / Patents
v.	Property records
1.	Original Purchase and Sale Agreement
2.	Property Card, Index II, Ownership records issued by Government Authority
3.	Property Insurance
i.	Projects
1.	Project Documents and Related correspondence (including any proposal of the Project and its approval)
2.	The documents containing the terms and conditions regarding operation and management of manufacturing units

i.	Correspondence and Internal memo
a)	Those pertaining to non-routine matters or having significant lasting consequences
i.	Insurance records
1.	All Insurance Policies
x.	Personnel records
1.	Payroll Register
2.	Bonus, Gratuity and other Statutory records
x.	Agreement
a)	Material Agreement and Contracts

ANNEXURE – B

Preservation – For not less than 8 years after completion of the relevant transaction

A.	Corporate Records
(i)	Annual Returns and other Forms filed with MCA
(ii)	Board Agenda and supporting documents
(iii)	Attendance Register
(iv)	Office copies of Notice of General Meeting and related papers
(v)	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers
(vi)	All notices pertaining to disclosure of interest of director
(vii)	Correspondence with Department/Stakeholders
(viii)	Certificates surrendered to a Company
(ix)	Instrument creating a charge or modification
(x)	Any other documents which have been so decided to be preserved by the Function/Department Heads, either under their own respective judgments or as required to be preserved by any specific Law
(xi)	Miscellaneous – Register of debenture-holders, if any
(xii)	Miscellaneous – Index of debenture-holders, if any
B.	Accounts and Finance
1.	Annual Plans and Budgets
2.	Books of Accounts, Ledgers and Vouchers
3.	Sales Invoices and Purchase Invoice
4.	Bank Statements
5.	Investment Records
6.	RBI Returns
7.	Foreign Trade documents
8.	Miscellaneous – General Correspondence
C.	Tax Records
i.	Tax Deducted at Source (TDS) records

ii.	Income tax papers and Service tax papers
D.	Legal files and records
1.	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)
2.	Miscellaneous – Legal Memoranda, Opinions including subject matter files and Litigation Files
E.	Correspondence and Internal memo
a)	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences. For example; - Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; - Letters of general enquiry and replies that complete the cycle of correspondence;
F.	Insurance records
a)	Journal Entry support data
b)	Inspection Reports
c)	Claims records (Till settlement is over and claim money is received)
d)	Group Insurance Plans (Until plan is amended or Terminated)
G.	Personnel records
a)	Time office/HR Records and Leave Applications
b)	Unclaimed Wages Records
c)	Employees Information Records
d)	Statutory Returns /Reports
e)	Miscellaneous – Employees Medical Record
H.	Electronic records
a)	Electronic mails (e-mails)
b)	Internet cookies of Web Page files