

ANMOL INDUSTRIES LIMITED



As approved by the Meeting of Directors on 24.02.2018 and
Version 2 on 10.09.2026

POLICY FOR PRESERVATION OF DOCUMENTS

(Version 2.0)

ANMOL INDUSTRIES LIMITED

Registered Office: 229, A.J.C. Bose Road, Unit 3A, 3B, 3C & 3D, Crescent Tower, 3rd Floor,
Kolkata 700 020, West Bengal, India

Phone: 9836265111

Email: cs@anmolindustries.com

Website: www.anmolindustries.com

Contents

1.	PREFACE AND OBJECTIVE	3
2.	EFFECTIVE DATE & DEFINITIONS.....	3
3.	DOCUMENTS TO BE PRESERVED.....	4
4.	RESPONSIBILITY.....	5
5.	DESTRUCTION OF DOCUMENTS.....	6
6.	GENERAL.....	6
7.	AMENDMENT TO THE POLICY.....	8

POLICY FOR PRESERVATION OF DOCUMENTS, 2018

1. PREFACE AND OBJECTIVE:

Anmol Industries Limited (AIL) is framing (will be obligated to frame) a policy for preservation of documents in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI-LODR). As per Regulation 9, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode. In accordance with the above Regulation 9, the Company has framed a Policy for Preservation of Documents, 2016 (hereinafter the "Policy"). The Policy is framed in line with the existing provisions of SEBI-LODR. Any future changes in the SEBILODR will, ipso facto, apply to this Policy. The Policy has been approved by the Board of Directors in its meeting held on 10th September 2026.

2. EFFECTIVE DATE:

The Policy shall be effective from 10th September, 2026

DEFINITIONS:

- 2.1 **"Authorized Person"** means the officer(s) of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents.
- 2.2 **"Board of Directors" or "Board"** means the Board of Directors of Anmol Industries Limited, as constituted from time to time as per the relevant laws and rules and regulations.
- 2.3 **"Company"** means Anmol Industries Limited and its subsidiaries.
- 2.4 **"Documents"** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained, whether maintained in physical or electronic mode under any law or regulation for the time being in force.
- 2.5 **"Policy"** means this Policy on preservation of documents formulated by the Company.
- 2.6 **"SEBI Listing Regulations"** means the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, as amended from time to time. Unless the context otherwise requires, words and expressions used in this Policy and not defined herein but defined in the Act and SEBI Listing Regulations as may be amended from time to time shall have the meaning respectively assigned to them therein.

3. **DOCUMENTS TO BE PRESERVED:**

This Policy sets the standards for preservation of documents of the Company, broadly classified in the following categories, which may be preserved, in physical and/or electronic mode.

(i) CATEGORY A - DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

The following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- (a) Annual Reports of the Company.
- (b) Minutes of the Board Meetings and Board Committees as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- (c) Minutes of General Meetings (including AGMs) as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India.
- (d) Any other document, certificates, statutory registers that may be required to preserved permanently in terms the Companies Act, 2013 and/ or SEBI.

(ii) CATEGORY B - DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION.

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

- (a) Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI-LODR, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.
- (b) Documents/Information submitted to Registrar of Companies / Ministry of Corporate Affairs in compliance with the Companies Act, 2013 & Rules thereunder shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is submitted.
- (c) Books of Accounts

- (d) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013 ;
- (e) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- (f) Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India.
- (g) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- (h) Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act, 2013 and/or SEBI Regulations.

(iii) CATEGORY C – GENERAL

In addition to the documents mentioned in Category 'A' and 'B' above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing Rules/ Procedures/ Practices of the Company or as per the applicable Statutory/ Regulatory provisions in this regard.

(iv) MODE OF PRESERVATION

- (a) The Documents may be preserved either in physical form or electronic form.
- (b) The officer(s) of the Company who is / are generally expected to observe the compliance of requirements of Applicable Laws shall be the person(s) responsible to preserve the Documents. Accordingly, Mr. Akhilesh Narayan Shukla, Company Secretary and Compliance Officer, is hereby authorised as the designated person responsible for the preservation and maintenance of such Documents.
- (c) The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content,

authenticity, utility or accessibility of the Documents.

- (d) The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorised person for preservation, to ensure integrity and confidentiality of the Documents and prohibit unauthorised access.
- (e) The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.
- (f) The Documents may be stored at the registered office, corporate office or branch office(s) of the Company, at the premises of the Registrar and Share Transfer Agent of the Company, or on cloud or third-party servers with appropriate safeguards, or at such other location as the Company may consider appropriate, in each case in accordance with Applicable Law”

4. RESPONSIBILITY:

The Heads of respective Departments of the Company shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.

Record Maintenance and Storage:

- A. Documents maintained in physical and electronic form:
 - 1. All information and/or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
 - 2. All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.

5. DESTRUCTION OF DOCUMENTS:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/ concerned Functional Director/ Head of the Department. This applies to both physical and electronic documents.

Disposal of Records:

Physical records disposed of pursuant to the retention periods specified in the document retention schedule shall be disposed of using a cross-cut shredder. The records department shall adopt appropriate procedures to permanently dispose of any non-paper physical records, such as photographs or audio/video recordings. In the event that it is necessary to manually dispose of an electronic record, the IT department shall use the “permanent delete” function to permanently

dispose of electronic records."

6. 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.

Hold On Record Destruction and Deletion:

If a lawsuit or other proceeding involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, must cease immediately ("Document Hold Direction"). Documents relating to the lawsuit or potential legal issue will then be retained and organized under the supervision of the legal department.

Violation of this aspect of the Company's Policy, could subject the Company and the employees involved to civil and criminal penalties.

In the event of a Document Hold Direction, the IT Department shall immediately disable the "permanent delete" and "automatic delete" functions of the Company's software with respect to the designated records and disable the automatic deletion of recycle bins and deleted items folders on appropriate Company computers; the records department shall immediately suspend all disposition of records maintained on-site or off-site location as appropriate; and the legal department shall immediately notify appropriate employees by e-mail that they are not to dispose of relevant temporary records or other records until notified otherwise.

E-Mail Policies

All electronic communication systems as well as all communications and stored information transmitted, received, or contained on the Company's information systems are the property of the Company. Employees using this equipment for personal purposes do so at their own risk. Employees have no expectation of privacy in connection with the use of Company equipment or with the transmission, receipt, or storage of information using the Company's equipment. Authorized Company personnel may access communications and stored information at any time without notice or consent.

Employees should avoid using Company e-mail for personal purposes. Personal e-mails should be deleted as soon as possible. E-mails relating to audit work papers and financial controls should be retained for at least 8 years.

All emails to the Company's Officers or Audit Committee relating to complaints on auditing, accounting, frauds, or internal controls should be retained permanently.

Any messages exchanged between the Company and third parties (such as consultants and auditors) should be archived, regardless of their content. Instant messages have the same status as e-mails and should be treated identically."

7. **AMENDMENT TO THE POLICY:**

Chairman, AIL is authorized to amend or modify this Policy on recommendations of the Audit Committee. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.
