

POLICY ON PRESERVATION OF DOCUMENTS

1. Introduction

A policy on preservation of Documents (defined below) would ensure safe keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), on preservation of the Documents to aid the employees in handling the documents efficiently. It not only covers the various aspects on preservation of the documents, but also the safe disposal/destruction of the Documents.

The Board of Directors (the "Board") of 3i Infotech Limited (the "Company") has, accordingly, adopted the following policy and procedures with regard to Preservation of Documents at its Board Meeting held on July 24, 2024. The Board may review and amend this policy from time to time.

2. Policy Objective

The objective of the Policy is to make a framework for classification of documents which are required to be preserved permanently or at least for 8 years and to ensure their availability for easy retrieval, when needed.

3. Definitions

- "Act" means the Companies Act, 2013.
- "Applicable Law' means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.
- "Authorised Person" means any person duly authorised by the Board.
- "Board" means the Board of directors of the Company or its Committee.
- "Company" means Melstar Information Technologies Limited.

- "Current Document(s)" means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- "Document(s)" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, 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 on paper or in Electronic Form and does not include multiple or identical copies.
- "Electronic Record(s)" means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- "Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, 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.
- "Maintenance" means keeping Documents, either physically or in Electronic Form.
- "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- "Regulations" means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 "

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

4. Responsibility

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective department.

5. Time period for preserving the document.

Time period for preserving the document shall be classified into two categories as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

1. Documents whose preservation shall be permanent in nature;

2. Documents with preservation period of not less than eight years after completion of the relevant transactions.

| Sr. No. | Records |
|---------|--|
| 1. | Certificate of incorporation |
| 2. | Certificate for commencement of business |
| 3. | Memorandum and Articles of Association |
| 4. | Agreements made by the Company with Stock Exchanges, |
| | Depositories, etc. |
| 5. | Minute Books of General Meetings, Board and Committee Meetings as |
| | per Companies Act, 2013 |
| 6. | Register and Index of Members |
| 7. | Register of Contracts as per Companies Act, 2013 |
| 8. | Register of Charges as per Companies Act, 2013 |
| 9. | Register of Investments as per Companies Act, 2013 |
| 10. | Files relating to premises viz. Title Deeds/ Lease Deeds of owned |
| | premises/land and building, etc. and related Ledger / Register |
| 11. | Authorization / licenses obtained from any statutory authority |
| 12. | Policies of the Company framed under various regulations |
| 13. | Register of disposal of records |
| 14. | Certificates obtained from various statutory authorities |
| 15. | Such other records as may be required under any law from time to |
| | time |
| 16. | Register of Inter Corporate Loans and Investments as per section 186 |
| | of the Companies Act, 2013. |

1. Documents whose preservation shall be permanent in nature;

2. Documents with preservation period of not less than eight years

| Sr. No. | Records |
|---------|--|
| 1. | Instrument creating charge or modification (from the date of |
| | satisfaction of charge) as per Companies Act, 2013 |
| 2. | Register of Debenture Holders or any other security holders along with |
| | the index from the date of redemption of debentures or securities |
| 3. | Annual Returns as per Companies Act, 2013 |
| 4. | Register of Deposits as per Companies Act, 2013 |

| 5. | Register of Allotment (from the date of each allotment) as per |
|-----|---|
| | Companies Act, 2013 |
| 6. | Annual financial statements including: |
| | - Annual accounts |
| | - Directors report |
| | - Auditors report |
| 7. | Vouchers / Voucher register and books of accounts as defined under |
| | subsection 13 of section 2 of the Companies Act, 2013 |
| 8. | Income Tax Returns filed under Income Tax Act, 1961 |
| 9. | All notices in form MBP -1 received from Directors and KMPs |
| | alongwith any amendment thereto |
| 10. | Return of declaration in respect of beneficial interest in any share as |
| | per Companies Act, 2013 |
| 11. | Copy of newspaper advertisement or publications |
| 12. | Records relating to Court Cases / CBI Cases / Police Cases/ Civil |
| | Suits/ Labour Court Cases/ Arbitration Cases |
| 13. | Compliance Reports received from any statutory authority |
| 14. | Correspondences made with any statutory authority |
| 15. | Register of Power of attorneys, if any |
| 16. | Forms and returns filed with RBI/MCA or with any other statutory |
| | authority |
