



POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL PROCESS

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Preamble:

Regulation 9 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 ['Listing Regulations'], read with Regulation 30 of Listing Regulations, requires listed companies to formulate a policy, approved by their Board of Directors, for the preservation of documents and an Archival Policy.

In accordance with the abovementioned Regulations, the Company has formulated a Policy for Preservation of Documents and Archival Policy ['Policy'] of Maxwell Engineering Solutions Limited ['the Company']. The Policy is framed in line with the existing provisions of Listing Regulations. Any future changes in the Listing Regulations will, ipso facto, apply to this Policy.

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per the Policy.

Objective:

The objective of the Policy is to ensure that all important documents generated or received by the Company are adequately maintained and preserved in compliance with the applicable statutory provisions and to facilitate the destruction of documents that are no longer required at an appropriate time and in a specified manner.

The Policy establishes the guidelines for the management, retention, preservation, and destruction of documents, both in physical and electronic form, by the Company.

All Company documents shall be maintained in compliance with the requirements of the Applicable Laws, including the Companies Act, 2013 and SEBI Listing Regulations.

The major objectives of the policy are:

- To identify statutory records to be preserved.
- To identify records to be maintained either for a period of eight (8) years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form.
- To help employees understanding their obligations in retaining and preserving the documents and records.
- Effective corporate governance and risk management.
- Effective information management to support the work of the administrations and provision of continued access to it at times when needed.
- Systematic disposal/destruction of Company's non-current records that have outlived their administrative usefulness.
- Identification of the Company's records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company's Archives.

Regulatory Framework:

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

Regulation 9 of SEBI Listing Regulations requires the 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:

1.2.1 Documents whose preservation shall be permanent; and

1.2.2 Documents to be preserved for not less than eight years (8 years) after completion of the relevant transactions.

Regulation 30(8) of SEBI Listing Regulations requires listed entities to disclose on its website all such events or information which has been disclosed to the Stock Exchange(s) under SEBI Regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

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

In case there is any conflict between the definitions mentioned hereinabove and the Listing Regulations, then the definitions under the Listing Regulations, as amended from time to time, shall prevail.

Scope & Applicability:

This Policy shall come into force from the date of approval by the Board of the Company.

The Policy covers all relevant Documents and Records generated during the course of operations of the Company.

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

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.

Definitions:

In this Policy unless the context otherwise requires,

1. Act:

“Act” means the Companies Act, 2013 or the Securities and Exchange Board of India Act, 1992 or any statutory modification or re-enactment thereof and includes any Rules and Regulations framed thereunder, as the case may be in respect to the reference made in the provisions under this Policy.

2. Articles:

“Articles” means the Articles of Association of the Company, as modified from time to time.

3. Archival:

Archival means accumulation or storage of historical records on server or network or at a physical place.

4. Authorized Person:

“Authorized Person” means any person duly authorized by the Board, Managing Director or any Executive Director of the Company.

5. Board:

“Board” means the collective body of the Directors of the Company.

6. Books of Account:

“Books of account” means as defined in the Act.

7. Committees:

“Committees” means Committees of Board constituted by virtue of Directions under Companies Act 2013, and Listing Regulations or by any other statutory body for the time being in force.

8. Company:

“Company” shall mean Maxwell Engineering Solutions Limited.

9. Current Documents:

“Current Document(s)” means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceeding, compliant, dispute, contract, or any like matter.

10. Documents:

“Documents” means all papers, files, books of account, certificate, summons, notice, license, requisition, order, declaration, confirmation, evidentiary record, electronic record, electronic mail, instrument, statements, agreements, deeds, permissions, press release, returns, official publication, report, policies, record, form, register, voucher, ledger, minute book, Floppies, CDs, DVDs, Electronic Storage Devices, etc whether issued, sent 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 mode etc or that serves as an official record of the Company.

11. Electronic Mail:

“Electronic mail” means the message sent, received or forwarded in digital form using any electronic communication mechanism that the message so sent, received or forwarded is storable and retrievable.

12. Electronic mode:

“Electronic mode” means data sent, received or forwarded is storable and retrievable using electronic medium, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

13. Electronic Record(s):

“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.

14. Key Managerial Personnel:

Pursuant to the provisions of the Companies Act, 2013, the Company, shall have the following whole-time Key Managerial Personnel, -

- i. Managing Director, or Chief Executive Officer or manager and in their absence, a whole-time director.
- ii. Company Secretary; and
- iii. Chief Financial Officer.

15. Maintenance:

“Maintenance” means keeping document(s), either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such documents.

16. Meeting:

“Meeting” means a meeting, duly convened and constituted, of the Board or any committee thereof or of the Members of the Company.

17. Member:

“Member” means any person who agrees, either by subscribing to the Memorandum of Association of the company or by applying in writing, to become a member of the company and whose name is entered either in the Register of Members of the Company or in the records of the Depository as a beneficial owner in respect of the equity shares of the Company held by him.

18. Preservation or preserve:

“Preservation” of “preserve” means to keep in good order; to prevent from being damaged or destroyed or tampered with.

19. Record:

“Record” means documentary evidence of past events or transactions.

20. Register:

“Register” means a register maintained under the Act and includes registers referred to in this Policy.

21. Senior Management:

“Senior Management” shall mean officers/personnel of the listed entity who are members of its core management team excluding board of directors and normally this shall comprise all members of management one level below the chief executive officer/managing director/whole time director (including chief executive officer/, in case they are not part of the board) and shall specifically include company secretary and chief financial officer.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

Preservation of Documents & Records:

The Company shall preserve all its documents and records in compliance with the provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and any other applicable laws, rules, regulations, and internal policies of the Company, as may be in force from time to time.

While this Policy lays down the minimum period for preservation, the specific retention period of documents not expressly identified herein shall be determined by the relevant Head of Department, based on general guidelines, statutory requirements, and other relevant considerations.

The responsibility for maintenance and preservation of documents and records shall rest with the respective Head of Department, who shall ensure compliance with this Policy and applicable legal requirements.

Documents and records shall be classified into the following categories for the purpose of preservation **[Annexure]**:

Category A: Documents and records that are required to be preserved permanently or for such period as may be mandated under applicable laws or regulations.

Category B: Documents and records that are required to be preserved for a minimum period of 8 (eight) years after completion of the relevant transactions or as otherwise determined by the relevant Head of Department in accordance with legal or business requirements.

Category C. Documents which are to be maintained on website of the Company for a minimum period of five (5) years.

Archival Process for Documents and Disclosures:**Website Disclosures under SEBI Listing Regulations:**

All disclosures made by the Company to the Stock Exchanges under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be hosted on the Company's website (<https://maxwells.in/>) for a minimum period of five (5) years from the date of disclosure.

Archival of Disclosures:

Upon completion of the five-year period, such disclosures shall be archived using appropriate technology and shall be retained for an additional period of two (2) years, or such longer period as

may be directed by the Board. Archived information shall be made available upon a written request to the Compliance Officer of the Company.

Access and Preservation of Archived Records:

Archived records shall not be destroyed or purged without obtaining prior written permission from the respective functional heads authorized to oversee the preservation of such records.

Mode of Archiving:

Records and documents may be archived in physical and/or electronic form, as may be deemed appropriate by the Board of Directors.

Documents archived in electronic form shall be subjected to automatic periodic backups in accordance with the procedure established by the Company to ensure data integrity and availability.

Location of Records:

Records shall be maintained at the Registered Office of the Company and be preserved accordingly.

Type of Information Archived:

The following categories of information shall be archived after the prescribed display period:

Financial Data: Including annual reports, financial results, and other investor communications as required under applicable regulations.

Press Releases & News Announcements: Including communications relevant to stakeholders, media, analysts, or the public, as disclosed to the Stock Exchanges under Regulation 30 of the SEBI (LODR) Regulations.

Departmental Responsibility:

Each functional department/unit shall:

- Identify and maintain the documents and records required to be preserved and archived.
- Follow the established archiving procedure and ensure ease of retrieval and reference.
- Ensure compliance with this Policy, applicable laws, and internal guidelines regarding archival and retention.

Destruction/Disposal process of Documents & Records:

Destruction of documents shall be carried out as a normal administrative practice for records that are duplicated, unimportant or for short-term use only. This applies to both physical and electronic documents.

Documents that have completed their minimum statutory or regulatory retention period, as prescribed under this Policy or applicable laws, may be destroyed, provided:

- There are no ongoing litigations, investigations, audits, or disputes related to such documents.

Prior written approval is obtained from the Board of Directors or such authorized person(s) as may be designated by the Board.

Procedure for Destruction:

The documents shall be destroyed by the Authorized Person in whose custody they are maintained.

Where specific procedures for disposal are prescribed under any applicable law, such procedures shall be followed.

In the absence of specific legal requirements, the standard operating procedures of the respective department shall apply.

Register of Destruction:

A register of documents destroyed shall be maintained, containing:

- Brief particulars of the documents destroyed
- Date of destruction
- Mode of destruction

All entries in the register shall be authenticated by the concerned Authorized Person(s).

Mode of Destruction:

- Non-confidential paper records: Recycled
- Confidential paper records: Shredded or otherwise rendered unreadable
- Electronic records: Deleted or destroyed using appropriate secure methods ensuring irretrievability.

Review of Policy:

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for approval and noting at a meeting of the Board.

In the event of any conflict between the provisions of this Policy and of the Act or regulations or any other statutory enactments, the provisions of such Act or regulations or statutory enactments would prevail over the Policy and the provisions in the policy would be modified in due course to make it consistent with law.

Amendment:

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

If there is any inconsistency between the terms of the Policy and the Listing Regulations, the provisions of the Listing Regulations shall prevail. Any amendments to the Listing Regulations shall mutatis mutandis be deemed to have been incorporated in this Policy.

Version History:

Sr. No.	Version	Created by	Approved By	Approval Date
1	1.0	Secretarial	Board of Directors	July 26, 2025.

The Documents Preservation Schedule is organized as follows:

Sr. No.	Description of Record
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A. Documents whose preservation shall be permanent in nature:

Corporate Secretarial Documents:

1	Memorandum and Articles of Association of the Company.
2	Certificate of Incorporation
3	Minutes of Shareholders', Board and Committee Meetings
4	Resolutions passed by the Board or Committee in circulation and related documents.
5	Register and Index of Members
7	Register of loans, guarantee, security and acquisition made by the Company, if any.
8	Register of investments not held in the name of the Company, if any.
9	Register of contracts with related party in which directors are interested.
10	Register of Charges
11	Registers of Renewed and duplicate share certificates.
12	Register of Directors and Key Managerial Personnel.
13	Register of Transfer & Transmission of shares.
14	Forms filed with Registrar of Companies (ROC).
15	Annual Reports.
16	Tripartite Agreement with the Depositories and the Registrar and Share Transfer Agent (RTA) of the Company.
17	Agreement with the RTA, Lease and Sale Agreements, Rent Agreements, Non-Disclosure Agreements, Contracts, Agreements (unless specifically addressed elsewhere in this policy), Deeds, Licenses.
18	Prospectus.
19	Company Policies/Charters/Bye laws.
20	Listing Agreement executed with the Stock Exchanges.

Accounts and Finance Records:

1	Annual Audited and Financial Statements
2	Tax Exemption and related documents.
3	Tax Bills, receipts and payments.

Legal Files and Records:

1	Court Orders.
2	Merger Order(s) issued by the Hon'ble High Court/National Company Law Tribunal and Merger related
3	Licenses, Approvals and Product Registrations issued by the Statutory Authorities, Central & State
4	Records related to development of intellectual property including Patent, Trademark, Copyright or Trade Secret.

Property Records:

1	Original Purchase and Sale Agreement.
2	Property Card, Index II, Ownership records issued by Government Authority
3	Property Insurance

Insurance Records:

1	Insurance Policies
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Personnel Records:

1	Payroll Registers
2	Bonus, Gratuity and other Statutory Records.
3	Any other document as may be required to be maintained permanently in terms of applicable law.

B. Documents with a preservation period of not less than eight years after completion of the relevant transaction:

Corporate Secretarial Documents:		
1	Attendance Register – Board and Committee Meetings.	
2	Notices pertaining to disclosure of Interest by the Directors.	
3	Correspondence with shareholders.	
4	Disclosures under SEBI – Substantial Acquisition of Ahares and Takeovers Regulations.	
5	Disclosures under SEBI – Prohibition of Insider Trading Regulations.	
6	Postal Ballot forms.	
7	Scrutinizer’s Reports on voting at General Meetings/ Postal Ballot.	
8	Newspaper clippings of Financial Results, etc.	
9	Submissions to the Stock exchanges pursuant to SEBI Listing Regulations.	
10	Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings.	
11	Annual Return and related documents.	
12	Register of debenture holders & register of any other security holders, if any.	
13	Foreign Register of Members, if any	
14	Foreign Register of debenture holders, if any.	
15	Register of deposits accepted or renewed, if any.	
Accounts and Finance Records:		
1	Books of Accounts, Ledgers & Vouchers.	
2	Investment Records	8 Financial Years from the date of redemption
3	Engagement letters from Auditors.	
4	Tax returns and records.	
5	Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return	8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later
6	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax	
7	Any other document as may be required to be maintained in terms of applicable law.	
Legal Files and Records:		
1	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts
2	Legal Memoranda and Opinions including subject matter files	8 years after the close of matter
3	Litigation files	
Insurance Records:		
1	Journal Entry support data	
2	Inspections Reports	
Personnel Records:		
1	Any other Employment /Personnel Record	8 years following cessation of employment in case of employees of the Company.

C. Documents which are to be maintained on website of the Company for a minimum period of five (5) years:

1	Disclosure of all events and information provided to the Stock Exchanges as per the Listing Regulations.
2	Investor Presentation and audio video recordings/transcripts of investor calls.
3	Press Release.

The above documents as uploaded on the Company's website will be archived for a period of two (2) years and thereby destroyed as per this Policy.