



PRECISION ELECTRONICS LIMITED

Policy on Preservation of Documents

<u>Approver</u>	<u>Board of Directors</u> Revised Policy approved at the board meeting held on August 6, 2025
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1. Preamble

Documents and Records in whatever form is an essential and significant part of the Company's resources. Documents and Records are a basic tool of administration. They are the means by which operational processes and functions are performed.

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "**Listing Regulations**"), every listed company is required to formulate a policy to define a process for the preservation of important documents or records generated or received by it. Taking the same into consideration, this policy has been framed for the preservation of documents (hereinafter referred to as "**the Policy**" or "**this Policy**") for Precision Electronics Limited ("**the Company**").

All the Words and expressions used in the Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the Listing regulations and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars made/issued thereunder, as amended from time to time.

2. Objectives of the Policy

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.

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

The term "Document" or "Record" is to be construed broadly and includes any recorded information in any format which is required to be preserved/maintained under any law.

3. Scope of the Policy

The Policy shall apply to all documents generated or received by the Company, both in physical form as well as electronic form as per the applicable statutory and regulatory requirements.

4. Classification of Documents

The Documents of the Company shall be classified into the following categories based on the period of preservation:

- 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;
- c) Miscellaneous Documents.

Documents specified in clauses (a), (b) and (c) above may be kept in electronic mode.

Schedule A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The list of Documents is an indicative list and shall not be construed to be exclusive.

The Company Secretary, under the supervision/guidance of the Board of Directors and in consultation/recommendation from the respective Head of Department, is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State, and Central Laws and monitor compliance with this Policy.

5. Mode and Responsibility of Preservation

- a) The documents as specified may be preserved in Physical Form or Electronic Form. However, all vital documents shall be scanned for digitisation and may be preserved under the control of the Head of Department ('HOD') or Function Head. Whenever a Document is maintained both in Physical and in Electronic Form, the authenticity with reference to the Physical form shall be considered for every purpose.
- b) All documents and records must be properly maintained in appropriate storage facilities commensurate with the size and nature of documents, which allow proper access and at the same time ensure protection from any loss or damage due to theft, fire, flood, termite etc. A comprehensive list of documents preserved, location of storage, and access control shall be maintained by the respective HOD or Function Head.
- c) Electronic version of the documents is to be maintained in the Company's centralised database, maintained by the IT department. For the maintenance of documents and records in electronic form, the computer & storage systems used must be of appropriate configuration and with necessary safeguards, including firewall security to prevent any data theft, loss, hacking etc.
- d) The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- e) The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.
- f) All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and to decide to retain/preserve or destroy documents pertaining to their area in consultation with their superiors. HOD or Function Head shall ensure security and access restrictions for maintaining the integrity and confidentiality of the documents.

Notwithstanding anything contained in this policy, if any document is required to be maintained and preserved under any Act or law for the time being in force, then such document shall be maintained and preserved as per the provisions of the particular Act or law.

6. Custody of Documents

Subject to applicable laws, the custody of Documents shall vest with the respective HOD or Function Head. The HOD or Function Head shall be responsible for the safekeeping and preservation of Documents under their control. Upon resignation, transfer, or change in responsibility of the HOD or Function Head, all Documents, records, access credentials, storage

devices, and related materials shall be duly handed over to the successor or such person as may be authorised by the Management.

Any original Document required to be taken outside the Company's premises for business purposes shall be removed only with the prior approval of the concerned HOD or Function Head and shall be returned promptly after completion of the purpose.

7. Procedure for disposal of Documents

Documents that have completed their prescribed retention period in accordance with the Documents Preservation Schedule set out in **Schedule A** may be disposed of with the approval of the concerned HOD or Function Head. The concerned HOD or Function Head shall authorise the disposal of such Documents and ensure that the disposal is carried out in a secure and appropriate manner.

A record of all Documents disposed of shall be maintained in the Register for Disposal of Records in the format specified in **Schedule B**. The entries in such Register shall be authenticated by the Authorised Person.

8. Preservation of documents beyond specified period

Notwithstanding anything contained in the Policy, in case of any directions from any statutory authorities, tribunals, tax authorities, registrar of companies, court of laws, etc. by an order in writing to preserve any specific document for a period beyond the specified period under the Policy, then the concerned department of the Company would be bound to preserve such documents for such period beyond the specified period till the matter is finally concluded.

9. Amendment to the Policy

The Policy facilitates preservation and disposal of “Documents” under the Acts, Rules, Regulations, Guidelines, etc., generally applicable to the Company. In case of any modification/amendment / re-enactment of any existing acts, rules, regulations, guidelines, etc. or an enactment of any new act, rules, regulations, guidelines, etc., which are inconsistent with this policy, then such modified/amended/re-enacted provision or new provisions shall prevail over the Policy.

SCHEDULE A: DOCUMENT PRESERVATION SCHEDULE

The Document Preservation Schedule is organized as follows:

Section Topic

- A. Corporate Documents
- B. Property Documents
- C. Contracts and Agreements
- D. License Agreements and IPR
- E. Employee Contracts and other Employee Related Records
- F. Legal and Statutory Documents
- G. Financial and Tax Documents
- H. Other Records

A. Corporate Documents		
S No.	Document type	Minimum Preservation Period
Documents to be retained permanently		
1.	Common Seal	Permanent
2.	Incorporation Documents	Permanent
3.	Share Certificates	Permanent
4.	Minutes of meetings of Board, Board Committees and General Meetings	Permanent
5.	Statutory Registers	Permanent
6.	Statutory Forms	Permanent
7.	Scrutinizers Reports	Permanent
8.	Register of Members	Permanent
9.	Index of Members	Permanent
10.	Corporate Policies framed under Companies Act, 2013 and / or Listing Agreement and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Permanent
Documents to be retained for a minimum period of 8 years		
1.	Annual Returns and copies of all certificates and documents required to be annexed thereto	8 years from the filing with the Ministry of Corporate Affairs
2.	Board Agenda and supporting documents	8 years
3.	Attendance Register	8 years
4.	Disclosures/ Notices by a director of his interest	8 years
5.	Instrument creating a Charge or Modification or Satisfaction	8 years from the date of satisfaction of charge
Miscellaneous		
1.	Joint Venture Agreements	Permanent or 8 years from the termination of the Agreement

2.	Shareholder’s Agreement	Permanent or 8 years from the termination of the Agreement	
B. Property Documents			
Sr. No.	Document type	Minimum	Preservation Period
Documents to be retained permanently			
1.	Original Purchase Agreement, transfers and conveyances	Permanent	
2.	Property Card, Ownership records issued by the Government Authority	Permanent	
3.	Latest Property Insurance	Permanent or 8 years from the date of disposal	
4.	Documents / Agreements regarding leases, leave and license	Permanent or 8 years from the date of termination	
5.	Sale Agreements	8 years from the date of sale	
C. Contract Agreements			
Sr. No.	Document type	Minimum	Preservation Period
Documents to be retained for a minimum period of 8 years			
1.	Originals of all project documents	8 years from expiry date of all contractual obligations	
2.	Tender documents		
3.	Contract agreements		
4.	Consortium agreements and any similar documents		
5.	All design drawings, specification of contracts		
D. License Agreements and IPR			
Sr. No.	Document type	Minimum	Preservation Period
Documents to be retained			
1.	IPR registration certificates	Permanent/ 8 years from expiry of IPR	
2.	Agreements entered with third parties for obtaining or providing IPR on license basis	Permanent/ 8 years from the expiry of the term of the agreement	
E. Employment Contracts and other Employee-related records			
Sr. No.	Document type	Minimum	Preservation Period
Documents to be retained for a minimum period of 8 years from the date of retirement/ resignation or dismissal of any employee of / by the Company			
1.	Payroll registers		

2.	Earning records	8 years
3.	Exemption certificates	
4.	Withholding tax documents and other relevant documents	
5.	Salary schedules	
6.	Job evaluations, reclassifications, merit pay increases and job descriptions	
7.	Records relating to promotion, demotion, lay-off, or discharge of employees	
8.	Appointment / Resignation / Termination Letter	
9.	Safety records, including logs of each occupational injury and illness, and annual summaries of all such injuries and illness.	
10.	Savings plan documents, valuation reports	
11.	Other employee documents	
12.	Other accounting and tax documents	
Miscellaneous		
1.	Stop payment orders	5 years from the date of retirement/ resignation or dismissal of any employee of/ by the Company
2.	Industrial environment records relating to compliances with the relevant Industrial Laws	10 years from the end of the financial year to which the records pertain.
F. Legal and Statutory Documents		
Sr. No.	Document type	Minimum Preservation Period
1.	All documents related to legal cases like Court Orders, arbitration, any settlement agreements, including mediation and outside counsels' legal opinions ,	10 years from the date of the relevant final decision rendered by the competent authority against which no appeal has been preferred by any person and / or party
2.	Statutory documents	As prescribed in the respective prevailing law.
G. Financial and Tax Documents		
Sr. No.	Document type	Minimum Preservation Period
Documents to be retained permanently		
1.	Original Applications made for availing of various licenses/permissions/registrations	Permanent
2.	All sales tax/VAT/ Service Tax and such other registration certificates	Permanent
3.	Original Voucher of all Capex incurred.	Permanent or 8 years from date of sale whichever is earlier.
4.	Annual financial statements	Permanent
Documents to be retained for a minimum period of 8 years from the end of Financial Year or completion of assessment under the applicable law whichever is later		

1.	Accounting books and records including all relevant certificates and documents, invoices, sales bill, expense vouchers, Journal entries, A/P Paidinvoices, A/R invoices and other relevant accounting records etc.	8 years
2.	Bank reconciliations	8 years
3.	General ledger	8 years
4.	Annual audit records	8 years
5.	All type of Tax returns	8 years
6.	Sales and use, property and other tax returns	8 years
7.	Superseded cheque signature authorizations	8 years
Miscellaneous		
1.	Stop payment orders	8 years
2.	Registration Book of Vehicle.	8 years from sale or useful life of vehicle whichever is earlier.
3.	Insurance Policies	8 years from the date of its expiry
4.	All Other accounting and tax documents	As prescribed in respective prevailing law.

Note: In the event, insurance policies are produced as evidence under any litigation / legal proceedings, such policies shall be retained without limitation. After closure of the litigation such documents must be sent to the Legal Team/Department.

H. Other Records		
Sr. No.	Document type	Minimum Preservation Period
As may be required to be preserved under any applicable law.		

Note: If the abovementioned documents are disposed physically as per the Policy, then the electronic storage of that particular document, if any, shall also be disposed of along with it.

SCHEDULE B: REGISTER FOR DISPOSAL OF DOCUMENTS

Sr. No.	Particulars of Document Destroyed	Date and mode of destruction	Initial of authorised person	Initial of Head of Department
