



ASPRI SPIRITS LIMITED
(Formerly known as Aspri Spirits Private Limited)



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PRESERVATION OF DOCUMENTS POLICY

Version History

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PRESERVATION OF DOCUMENTS POLICY

1. Preamble

This Policy (hereinafter referred to as the "Policy") shall be called "Preservation of Documents Policy of Aspri Spirits Limited (hereinafter referred to as the "Company"). This Policy has been framed in compliance with the provisions of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (hereinafter referred to as "SEBI Listing Regulations") which requires every listed company to have a policy on preservation of documents, approved by its Board of Directors (hereinafter referred to as the "Board"), classifying them into at least two categories:

- a) Documents whose preservation shall be permanent in nature; and
- b) Documents to be preserved for not less than eight years after completion of the relevant transaction.

2. 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 Aspri Spirits 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.

3. Objectives of the Policy

The objective of this 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 destruction of documents that are no longer required, at an appropriate time and in a specified manner with the approval of the respective Functional/department head and as per the administrative practice of the Company.

This Policy establishes the guidelines for Management, retention, preservation and destruction of documents, both in physical form and Electronic Form (defined hereinafter), by the Company.

4. Scope of the Policy

This Policy shall apply to all Documents (defined hereinafter) which include records maintained in the form of books or stored in a computer or tapes or discs or in any other Electronic Form or transcribed information of any type, whether expressed in ordinary or machine language. The preservation of documents, as mandated under this Policy, shall apply to all documents regardless of its location, which are required to be maintained as per the statutory requirements of the Companies Act, 2013 (“Companies Act”) and SEBI Listing Regulations.

5. Preservation Schedule of Documents

The Documents shall be preserved under following categories:

- 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 transaction.
- c) Documents with preservation period specified by statutory authorities under applicable laws.
- d) Documents with preservation period specified under any other policy of the Company or duly approved by the Board/Management/ Functional Head, Entity Head as per the business needs of the Company or delegation of authorities etc. subject to (a) to (c).

6. Documents whose preservation shall be permanent in nature (Category A)

(i) All Documents as may be required under the applicable statute, laws, rules and regulations, namely including but not limited to the following shall be preserved permanently:

- a) Certificate of incorporation;
- b) Memorandum and articles of association of the Company;
- c) Agreements made by the Company with stock exchanges and depositories;
- d) Permanent account number;
- e) Tax deduction account number;
- f) Goods and service tax/ export/ import/ other registration certificates;



- g) licences, court orders, awards, patents, trademarks, copy rights;
- (ii) Statutory records and registers that are required to be maintained permanently under the provisions of the Companies Act, including annual financial statements with statutory auditors' reports, annual reports, etc., shall be preserved permanently.
- (iii) Minutes of the Board meetings, Board committee meetings, general meetings of shareholders of the Company etc., shall be retained in perpetuity in the Company's minute book.
- (iv) Agenda items and approval note for the agenda items along with relevant annexures thereto pertaining to the meeting of the Board/committee of the Board shall be preserved permanently.
- (v) Documents relating to any property of the Company, property tax, delegation of powers, all policies/ policy guidelines of the Company framed under various regulations, shall be retained perpetually.
- (vi) The records of disposal/ destruction shall be preserved permanently.

7. Documents to be preserved for not less than eight years after completion of the relevant transaction (Category B)

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 the SEBI Listing Regulations, shall be preserved for a minimum period of eight years from the end of the financial year in which the information/ documents are furnished;
- b) Documents/ information submitted to the Registrar of Companies/ Ministry of Corporate Affairs in compliance with the Companies Act, and the rules made thereunder, shall be preserved for a minimum period of eight years from the end of the financial year in which the information/ documents are submitted;
- c) Books of accounts as per the Companies Act;
- d) Board reports;
- e) Annual returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act;
- f) notices, agendas, 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 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India;
- g) notices, scrutinizer's reports and related papers regarding general meetings (including annual general meetings and extraordinary general meetings), 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 on General Meetings" issued by the Institute of Company Secretaries of India;



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- h) Attendance register for Board meetings and recording of attendance of meetings through electronic mode, shall be preserved for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India;
- i) Records under the Foreign Exchange Management Act, 1999, as amended/ Prevention of Money Laundering (Maintenance of Records) Rules, 2005, as amended, shall be retained for a period of 10 years;
- j) Any other documents, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transactions under the Companies Act and/or SEBI Listing Regulations.
- k) **Tax Records:** Tax records includes records of income tax, tax deduction at source (TDS), goods and service tax (GST), customs duty, but are not limited to Documents concerning tax assessment, tax filings, tax returns, proof of deductions, payment challans, invoices, tax audit reports, appeals preferred against any claim made by the relevant tax authorities ("Tax Records"). Tax Records shall be maintained for a minimum period of eight years from the end of financial year or up to the year of assessment/ disposal of appeal by the appellate authority, whichever is later as the case may be. Where the assessment in relation to any year has been reopened, in such case all the books of account and documents shall continue to be kept till the assessment so reopened has been completed or till appeal for reopening the issue is dismissed by the judiciary as time barred or it is finally settled by the Supreme Court of India.

Transfer pricing documents and information must be maintained for a period of eight years from the end of the relevant assessment year i.e., for a total period of 10 previous years

8. Documents with preservation period specified by statutory authorities under applicable laws (Category C)

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 circulars issued in this respect from time to time or as per the applicable statutory regulatory provisions in this regard.

- a) **Information on Website:** Disclosures made by the Company to the Stock Exchanges shall be hosted on the website of the Company for a minimum period of five years under the SEBI Listing Regulations. Upon completion of five years period, such disclosures shall be removed from the website of the Company under this policy of the Company.
- b) **Specified Orders:** Notwithstanding anything contained in this Policy, if a higher period of retention of documents is stated in any Act/ Statute or prescribed by any statutory authority, in the form of orders, direction or otherwise, such higher period shall become applicable.



9. Documents with preservation period specified under any other policy of the company or duly approved by the management/ functional/ strategic business unit head/ entity head as per the business needs of the Company or Delegation of Authorities (Category D)

In cases of documents not specifically stated or falling under the general principle of the documents covered by this Policy, such documents may continue to be preserved as per the process in existence in respective department.

10. General exception to preservation schedule

If there are reasons to believe, or the Company informs the employee concerned, that Company records are relevant for potential litigation (i.e., a dispute that could result in litigation), then the employee must preserve those records until the legal or respective department determines that the records are no longer needed.

11. Responsibility

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

12. Mode of Maintenance

The Company shall maintain these records either in physical or Electronic Form. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to. All the records shall be maintained as per the prescribed formats, if any, as amended from time to time, under the various rules and regulations. The said records be also maintained in such a manner that their retrieval is easy and quick.

13. Destruction Of Documents

Despite the fact that the retention period as per this policy has come to an end, the document shall be destroyed only after obtaining the prior approval of the functional head at the concerned plant/office and an intimation in this regard shall also be given to the Company Secretary before destruction. The destruction of documents as a normal administrative practice shall be followed for records which are duplicate/ unimportant or irrelevant. This applies to both physical and electronic documents.

14. 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.

15. Amendment to the policy

This Policy is framed in line with the existing provisions of the SEBI Listing Regulations. Any future changes in the SEBI Listing Regulations will ipso facto apply to this Policy. The Board of Directors of the Company shall have the power to amend this Policy, if required, due to any amendment in the Companies Act, SEBI Listing Regulations or any other acts as applicable. In case of any modification/ amendment/ re-enactment of any existing acts, rules, regulations, guidelines, etc. or an enactment of



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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 this Policy.

16. Disclosure on Website

A copy of this Policy including amendments thereto shall be hosted on the website of the Company.

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