



**PANABYTE TECHNOLOGIES LIMITED**

**(formerly known as Panache Innovations Limited)**

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**POLICY ON PRESERVATION OF  
DOCUMENTS / ARCHIVAL POLICY**

## 1. Scope

A Policy on Preservation of Documents (defined below) would ensure safekeeping 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**”). It not only covers the various aspects on preservation of the Documents, but also the safe disposal / destruction of the Documents.

## 2. Definitions

**2.1 “Act”** means the Companies Act, 2013.

**2.2 “Applicable Law”** means any Law, Rules, Circulars, Guidelines or Standards issued by the Securities & Exchange Board of India, the Ministry of Corporate Affairs and the Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

**2.3 “Board”** means the Board of Directors of the Company or its Committee.

**2.4 “Company”** means Panabyte Technologies Limited.

**2.5 “Current Document(s)”** means any document, which still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

**2.6 “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.

**2.7 “Electronic Record(s)”** means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.

**2.8 “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.

**2.9 “Maintenance”** means keeping documents, either Physically or in Electronic Form.

**2.10 “Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

**2.11 “Regulations”** means the Securities Exchange Board of India (Listing Obligations 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. Coverage

This Policy is intended to guide the Company and its Officers on maintenance of any Documents, their preservation and disposal.

### 4. Classification

The preservation of Documents shall be done in the following manner:

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is "Current".
- c) Those documents which are required to be made available on the Company's website in Compliance with the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 will be made available for a period of 5 years and thereafter will be archived for a period of 3 years.

- **An indicative list of the Documents and the timeframe of their preservation is provided in Annexure - I.**

### 5. Modes of Preservation

**5.1** The Documents may be preserved in

- 5.1.1 Physical Form or
- 5.1.2 Electronic Form.

**5.2** 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.

**5.3** The preserved Documents must be accessible at all reasonable times subject to ensuring integrity of the Documents and prohibition of unauthorized access.

### 6. Authority for Approval of Policy

The Board shall have the authority for approval of this policy in pursuance to the Regulations.

## 7. Authority to make alterations to the Policy

The Board is authorized to make such alterations to this Policy as considered appropriate, however, subject to the condition that such alterations shall be in consonance with the provisions of the Act and Regulations.

## 8. Destruction of Documents

**8.1** Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents.

**8.2** The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant period as deemed fit by the officials of the Company. The categories of Documents may be destroyed as normal administrative practices are listed in **Annexure - II**.

## 9. Conversion of the form in which the Documents are preserved

**9.1** The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form or *vice-a-versa* to ensure ease in maintenance of records and efficient utilization of space.

**9.2** This will be done subject to the approval of the Board.

## 10. Authenticity

Where a Document is being maintained both in Physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

## 11. Interpretation

In any circumstance where the terms of this policy differ from any existing or newly enacted Law, Rule, Regulation or Standard governing the Company, the Law, Rule, Regulation or Standard will take precedence over these Policies and Procedures until such time as this Policy is changed to confirm to the Law, Rule, Regulation or Standard.

## Annexure – I

## Indicative List

Permanent Preservation	Temporary Preservation
<ul style="list-style-type: none"> <li>• Common Seal</li> <li>• Agreements made by the Company with Stock Exchanges, Depositories, etc.</li> <li>• The Memorandum and Articles of the Company</li> <li>• Register of Members</li> <li>• Register of Renew and Duplicate Share Certificates</li> <li>• The Foreign Register of Members</li> <li>• Register of Charges as per the Companies Act, 2013</li> <li>• Minutes Book of General Meeting, Board and Committee Meetings as per Companies Act, 2013</li> <li>• All Sales Tax / VAT / Service Tax and such other Registration Certificates</li> <li>• Such other records as may be required under any law from time to time</li> </ul>	<p><b>Documents with Preservation Period of not less than 8 Years after Completion of the Relevant Transactions</b></p> <ul style="list-style-type: none"> <li>• Register of Debenture Holders or any other Security Holders (from the date of Redemption of Debentures or Securities)</li> <li>• Register of Allotment (from the date of each allotment) as per Companies Act, 2013</li> <li>• Copies of all Annual Returns prepared under Section 92 of the Companies Act, 2013 and copies of all Certificates and Documents required to be annexed thereto (from date of filing with the Registrar)</li> <li>• Foreign Register of Debenture Holders or any other Security Holders (from the date of Redemption)</li> <li>• All Notices pertaining to Disclosure of Interest of Directors (from the end of the financial year to which it relates)</li> <li>• Register of Deposits (from the date of last entry)</li> <li>• Instrument Creating a Charge or Modifying (from date of Satisfaction of Charge)</li> <li>• Vouchers / Voucher Register and Books of Accounts as defined under Sub-section 13 of Section 2 of the Companies Act, 2013</li> <li>• Income Tax Returns filed under Income Tax Act, 1961</li> <li>• Copy of Newspaper Advertisement or Publications</li> <li>• Records relating to Court Cases / CBI Cases / Police Cases / Civil Suits / Labour Court Cases / Arbitration Cases</li> <li>• Compliance Reports received from any Statutory Authority</li> <li>• Correspondences made with any Statutory Authority</li> <li>• Register of Power of Attorneys, if any</li> <li>• Forms and Returns filed with RBI / MCA or with any other Statutory Authority</li> </ul>

**Annexure – II**

The following categories of Documents may be destroyed as normal administrative practice:

- Catalogues;
- Copies of Press Cuttings, Press Statements or Publicity Material;
- Letters of Appreciation or Sympathy, or Anonymous Letters;
- Requests for Copies of Maps, Plans, Charts, Advertising Material;
- Facsimiles where a photocopy has been made;
- Telephone Message;
- Drafts of Reports, Correspondence, Speeches, Notes, Spread Sheets, etc.; and
- Routine Statistical and Progress Reports Compiled and Duplicated in Other Reports