

**THE POLICY DISPLAYED WAS APPROVED BY THE ERSTWHILE BOARD OF DIRECTORS OF THE COMPANY IN ITS MEETING HELD ON 5<sup>TH</sup> DECEMBER 2024, THIS POLICY HAS BEEN PUBLISHED ON THE WEBSITE OF THE COMPANY TO COMPLY WITH REGULATION 46 OF THE SEBI (LODR) REGULATIONS, 2015. THE BOARD OF THE COMPANY MAY MODIFY, ADD, DELETE OR AMEND ANY OF THE PROVISIONS OF THIS POLICY TIME TO TIME.**

**ICODEX PUBLISHING SOLUTIONS LIMITED**  
**Policy on Preservation and Archival of Documents and Information**

**1. Introduction**

This Policy on Preservation and Archival of Documents and Information ('Policy') provides a comprehensive statement of how ICODEX PUBLISHING SOLUTIONS LIMITED (the 'Company') intends to preserve and continue to make accessible the documents that will enable Investors and Stakeholders to access the current status of the Company.

**2. Duration of Preservation**

This Policy covers three categories of documents I information:

- a. Documents whose preservation shall be permanent in nature which are as follows:
- Register of renewed and duplicate share certificates;
  - Register of charges;
  - Register of members;
  - Register of directors & key managerial personnel;
  - Register of contracts or arrangements in which directors are interested (MBP-4);
  - General meeting minutes;
  - Board & committee meeting minutes;
  - Copies of all documents filed at the time of incorporation of the Company;
  - Foreign Register of Members (if any);
  - Register of loan, investment and guarantee (MBP-2);
  - Register of investment made by a company not held in its own name (MBP-3) (if any);
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions which are as follows:
- Register of sweat equity shares;
  - Register of renewed and duplicate share certificates;
  - Register of transfer & transmission of shares;
  - Register of employee stock option;
  - Register of security buy back;
  - Register of deposits;
  - Office copies of Notices, Agenda, Notes and other related papers;
  - Attendance Register for the Board & Committee Meetings;
  - Instruments creating or modifying Charges;
  - Register of Debenture holders;
  - Copies of all annual returns and all documents annexed thereto;
  - Postal Ballot Papers and other related papers;
  - Notice of disclosure of interest by Director in form MBP-1

c. Documents / information requiring preservation for a period of five years and upto eight years

This shall include all information disseminated by the Company to the Stock Exchanges. Such information shall be disclosed on the website of the Company for a period of five years from the date of dissemination to the Stock Exchanges.

In addition to the above, the Company shall maintain all such statutory records and registers as may be required under various laws and regulations for the period mentioned therein.

### **3. Manner of Preservation**

All other records will be preserved in such mode, whether physical or electronic, as may be permitted under applicable regulations.

The responsibility for preservation and archival of records across the organisation shall be in line with the respective functional responsibilities of the Employees of the Company.

All registers required to be maintained shall be maintained at the Registered Office of the Company, unless permitted and maintained otherwise.

### **4. Review and Disposal of Archived Documents**

The Company shall periodically review archived documents to assess their relevance and retention requirements. Documents that have fulfilled their retention period and are no longer required may be disposed of in a secure and environmentally responsible manner, in compliance with applicable laws.

### **5. Roles and Responsibilities**

Each department is responsible for archiving its documents in compliance with this policy. The Compliance Officer or a designated official shall oversee the implementation of this policy and ensure that archival practices align with regulatory requirements.

### **6. Review of Policy**

This policy shall be reviewed periodically to ensure alignment with regulatory updates, best practices, and the Company's operational needs. Any amendments shall be approved by the Board of Directors.

This Document Archival Policy demonstrates the Company's commitment to safeguarding its records, supporting regulatory compliance, and maintaining efficient document management systems.