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## Policy on Preservation of Documents

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### 1. Preamble

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Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015 [hereinafter referred to as “SEBI Listing Regulations” or “Regulations”] requires every listed company to have a policy on Preservation of Documents/records maintained by the Company either in Physical Mode or Electronic Mode.

Considering the critical importance of preserving and safeguarding documents, records, and information, **Patil Automation Limited**, hereinafter referred to as "the Company," establishes this Preservation of Documents Policy (hereinafter referred to as the “**Policy**”). This Policy shall be called “Preservation of Documents Policy” of Patil Automation Limited.

### 2. Scope

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This Policy shall apply to all the documents which include records maintained in the form of books or stored in a computer/server/tapes/discs/clouds or in any other electronic form or transcribed information of any type whether expressed in ordinary or machine language.

### 3. Objectives of the policy

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The main objective of this policy is to ensure that all the important documents generated or received by the Company are maintained and preserved in compliance with the applicable Regulations and as per policy framed and to ensure that the records no longer needed are discarded at appropriate time after following the due process.

This Policy aims to provide clear guidelines and procedures to all management for management, retention, preservation and destruction of documents, both in physical form and electronic form by the Company.

### 4. Definitions

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1. “**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;
2. “**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

3. **“Company”**, “This Company”, “The Company”, “Company” wherever occur in the policy shall mean “Patil Automation Limited”.
4. **“Current”** means running matter or whatever is at present in course of passage.
5. **“Board of Director”** or “Board”, means the collective body of the Directors of the Company;
6. **“Policy”** or “This Policy” means, “Policy on Preservation of Documents of Patil Automation Limited.”
7. **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
8. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
9. **“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.

## 5. Interpretation

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Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## 6. Preservation Schedule

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The Documents shall be preserved under following categories:

- (a) Documents whose preservation shall be permanent in nature.
- (b) Specified period, being
  - Period mandated under applicable law.
  - the period duly approved by the Functional Head at the Head Office, as per the business needs of the Company
  - not less than eight years in other cases

All documents which are required to be preserved permanently may also be additionally stored electronically/digitally.

All Documents must be properly classified, filed, labelled, indexed and stored by the respective departments.

The head of each department at divisional head office shall designate an officer of the department who shall ensure compliance with this Policy.

### **7. Documents to be preserved permanently (Category A)**

The documents of the Company which are no longer required as per the time schedule prescribed in the Annexure A may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under Annexure A. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at Annexure B. The entries in the register shall be authenticated by the Authorised Person.

### **8. 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 SEBI Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information are furnished.
- (b) Documents/information (save and except those under category A) submitted to Registrar of Companies / Ministry of Corporate Affairs in compliance with the Companies Act, 2013 & Rules hereunder shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information are submitted.
- (c) Books of accounts.

- (d) Office copies of notices, agenda, 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 of directors, as prescribed by the "Secretarial Standard-I on Meetings of Board of Directors" as issued by the Institute of Company Secretaries of India and any amendments thereto.
- (e) Office copies of notices, scrutinizer's report and related papers regarding general meetings (including AGM) 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 of directors, as prescribed by the "Secretarial Standard-2 on General Meetings" as issued by the Institute of Company Secretaries of India and any amendments thereto.
- (f) Attendance registers for board meeting and recording of attendance of meetings through electronic mode for eight financial years and may be destroyed thereafter with the approval of the board of directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- (g) Any other document, 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, 2013 and/or SEBI Listing Regulations.

## **9. General (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.

## **10. Responsibility**

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

## 11. Disposal of Documents

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After the expiry of the specified period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/concerned functional head of the department/Divisional head.

This applies to both physical as well as electronic documents.

## 12. Amendment to the Policy

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Chairman & Managing Director of the Company is authorized to amend or modify this Policy on recommendations of the Audit Committee. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

## 13. Disclosure on website

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

**Amendment to Law any subsequent amendment / modification in the SEBI Listing Regulations, Act and all other applicable laws in this regard shall automatically apply to this Policy**

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This policy was approved and adopted by the Board of Directors of the Company at its Meeting held on December 25, 2024.