

POLICY ON PRESERVATION OF DOCUMENTS

Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements)

Regulations, 2015

Approved by Audit Committee and Board of Directors Meeting held on 27th December 2023 and become applicable w.e.f from 27th December 2023

<u>“Introduction”</u>	
	<p>The Board of Directors (“the Board”) of Resourceful Automobile Limited (“the Company”) has adopted this Policy on Preservation of Documents (“this Policy”).</p> <p>This policy is framed as per the requirements of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) and shall be effective from 01st December 2023.</p>
<u>“Objective”</u>	
	<p>This Policy contains guidelines for identifying Documents that need to be maintained, the period of preservation of such Documents and its destruction/disposal. This Policy aims to provide efficient and systematic control on the periodicity and destruction of business-related Documents.</p>
<u>“Definitions”</u>	
	<p>For the purposes of this policy, the following definitions apply:</p> <p>“Act” means the Companies Act, 2013 and Rules made there under, as amended from time to time.</p> <p>“Document” means any documentary material in either paper or electronic form, generated or received by the Company including but not limited to an electronic document, CD-ROM, hard disk, email, microfilm, X-ray film, video tape, floppy disk, USB memory etc.</p> <p>“Register” means the register of various documents maintained by the Company on paper or in electronic form of various documents.</p> <p>“Secretary” as defined under Section 2(24) of the Companies Act, 2013 means a Company Secretary as defined in clause (c) of sub-section (1) of Section 2 of the Company Secretaries Act, 1980 who is appointed by a Company to perform the functions of a Company Secretary;</p>

<u>“Scope”</u>	
	This Policy applies to all departments and business functions of the Company but does not apply to personal or non-business information.
<u>“Mode and Periodicity of Preservation of Documents”</u>	
	<p>The Documents may be preserved in</p> <ul style="list-style-type: none"> (i) Physical form or (ii) Electronic Form. <p>The employee of the Company required to preserve the Document shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law</p> <p>The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction, or anything that endangers the content, authenticity, utility, or accessibility of the Documents.</p> <p>The preserved Documents must be accessible at all reasonable times. Access may be controlled by an Authorized Person with preservation, so as to ensure the integrity of the Documents and prohibit unauthorized access.</p> <p>The documents which are required to be preserved shall be annexed as Annexure-A along with their timelines.</p>
<u>“Destruction of Documents”</u>	
	The Documents should be destroyed at the end of the preservation period specified under Clause 5 of this Policy. 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. Electronic information, including e-mails that are no longer required to be retained, must be purged using appropriate techniques that ensure that the data cannot be reconstructed from the storage media on which it resides. Records stored on magnetic media must be destroyed by reformatting at least once. However, the backup copies of the records must also be destroyed.
<u>“Responsibility”</u>	
	Functional heads of respective Units shall be responsible for monitoring the implementation of this Policy.
<u>“Review and Amendments”</u>	

	The Board of Directors shall review this Policy as and when it deems necessary and approve changes, if any required from time to time in line with the statutory provisions. Any change to this Policy requires approval of the Board of Directors.
<u>"Interpretations"</u>	
	<p>In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.</p> <p>In case of any clarification required with respect to this Policy, kindly contact the Secretary of the Company.</p>

ANNEXURE A

Document Category	Document Type	Preservation period	Mode of Preservation
Company Operations	<ul style="list-style-type: none"> • Memorandum / Articles of Association • Certificate of Incorporation • Certificate of Commencement of Business • Licenses, certificates, approvals and other such documents issued by Central/State Government and any other statutory and/or regulatory body • Orders, judgments of judicial authorities • Policies and Codes of the Company • Other related Documents 	Permanent	Physical and/or electronically
Tax and Finance records	<ul style="list-style-type: none"> • Books of accounts, including inter-alia, financial statements, vouchers relevant to entry in books of accounts, audit records, invoices, expense records, bank records etc. in accordance with the applicable provisions of Companies Act, 2013, Income Tax Act, and any other applicable laws. • Application/correspondence with • Various Direct and Indirect tax authorities • Excise invoices/bills/challan • Returns and Assessment Records • Sales Tax documents • Loan-related Documents • Documents related to all other 	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/or electronically

Secretarial records	<ul style="list-style-type: none"> Statutory Registers, returns, forms as required under various applicable laws/ statutes / regulations etc. Notice, agenda and notes to agenda of meetings of the Board and its Committees Minutes of the meetings of the Board of Directors, Committees and shareholders Office copies of Notices, scrutinizer's report and other documents related to meetings of 	Permanent	Physical and/ or electronically
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	<ul style="list-style-type: none"> Attendance registers of the meetings of the Board and its Committees Statutory filings with the Stock Exchanges, SEBI, MCA, RBI, and any other statutory/regulatory authority Applications and approvals for issuance and listing of securities Press releases, publicly filed documents Land title deeds/ documents/ receipts Agreements pertaining to securities Other related Documents relating to litigations etc. 	To be preserved until the matter is resolved/ settled	
	Documents specified to be preserved for eight financial years under any applicable law/regulation/statute etc.	Eight financial years	Physical and/ or electronically
	Details relating to unclaimed/unpaid dividend	Seven years	Physical and/ or electronically

Legal	Executed copies of contracts/agreements entered by the Company	Eight years beyond the life of the contract or such period as may be specified under applicable law/statute	Physical and/or electronically
	Case files of all disputes/recovery with different authorities. Registration/Renewal Documents Documents relating to the development of intellectual property All Documents containing trade secrets <ul style="list-style-type: none"> • Original and supplementary license • Other Related Documents 	Permanent	Physical and/or electronically
	Documents relevant to litigation or any potential litigation (a dispute that may result in litigation), claim, audit, investigation or enforcement action.	Until the Legal Department of the Company determines that such Documents are no longer needed.	Physical and/or electronically
Production, Purchases related records	<ul style="list-style-type: none"> • Production procedures, production data, system-based records, MIS, rejections etc. • Other production-related records required to be maintained under any applicable law/statute etc. • Purchase orders, annual contracts, quotations and comparative quotation analysis etc. • Bill of entry/bill of loading, shipping 	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/or electronically

Strategy/ projects	<ul style="list-style-type: none"> Documents relating to projects Statistical information, negotiation drafts, analysis reports etc. Other related documents 	Five years beyond the life of the project/assignment or such period as may be specified under applicable	Physical and/or electronically
Employment / Personnel records	<ul style="list-style-type: none"> Documents relating to individual personnel records, payroll, salary history, bonuses, performance reviews etc. Other personnel related documents 	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/or electronically
Information Technology	<ul style="list-style-type: none"> Documents in relation to procurement of IT hardware, software, licenses etc. Operations & User Manuals License and Information Security Register Server logs Disaster Recovery Site logs Inventory of back up data 	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/or electronically
Marketing and Sales records	<ul style="list-style-type: none"> Sales & Marketing policies Debit Note/Credit Notes Credit Appraisal Forms & Ratings Agreements with Agents Collection Advices Related MIS 	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/or electronically
International	Documents governed by the jurisdiction of foreign country	As per requirement of concerned	Physical and/or electronically

Incidental or other business related information	<ul style="list-style-type: none"> Drafts and preliminary versions of documents superseded by work, paper and other transitory 	As long as it remains relevant	Physical and/or electronically
	<ul style="list-style-type: none"> Any other Document relating to the business of the Company 	180 days or as long as it remains current	Physical and/or electronically

Where the preservation period of Documents is not included in the above-identified categories, such period shall be determined by the application of the general guidelines affecting Document preservation identified in this Policy, as well as any other pertinent factors.

Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department.