



## **GLOTTIS LIMITED**

### **POLICY ON PRESERVATION OF RECORDS**

Under Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

**CIN: U63090TN2022PLC151443**

**Registered Office: New No.46, Old No.311, 1st Floor, Thambu Chetty Street, Chennai, Tamil Nadu, India, 600001**

## POLICY ON PRESERVATION OF RECORDS

### 1. PREAMBLE

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Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as **SEBI Listing Regulations**), requires every listed Company to formulate a policy on preservation of documents approved by the board of directors. During the course of business, the company generates several records either in physical or in electronic modes, most of the records are useful for a shorter span of time, hence such records are kept for a definite period of time, but some records may be needed to be kept for a longer period of time or permanently during the lifetime of the organization. In order to preserve such records, the company needs to implement a well-considered, well-documented plan to ensure that they remain trustworthy and useful over a period of time.

Pursuant to the provisions of the SEBI Listing Regulations, the listed company shall disclose on its website all such events or information which has been disclosed to stock exchange(s), and such disclosures shall be hosted and retained on the website of the company for a minimum period of 5 (five) years from the date of its publication (**“Mandatory Hosting Period”**) and thereafter, as per this policy. Beyond the Mandatory Hosting Period, the disclosed information shall be archived for retrieval for a period of 2 (two) years (**“Archival Period”**) considering the requirements of the applicable laws.

### 2. PURPOSE AND SCOPE

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In terms of the provisions of Regulation 9 of the SEBI Listing Regulations, the Company shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:

- i. documents whose preservation shall be permanent in nature;
- ii. documents with preservation period of not less than eight years after completion of the relevant transactions

Accordingly, the board of directors has formulated and approved this policy to preserve the documents of the Company.

Also, this policy shall cover all business records of the company, including written, printed and recorded matter and electronic forms of records. The policy ensures that the company maintains both physical and electronic records/documents preserved for such minimum period as required by the law for the time being in force and adequate protection and preservation of the documents of the Company as per the applicable statutory requirements. All records must be kept, keeping in mind the confidentiality and nature of the documents. The policy also deals with the retrieval process and disposal / destruction of obsolete records.

This policy will guide the Company, employees and officers in handling the documents efficiently and maintenance of any documents, their preservation and disposal/destruction.

### 3. DEFINITIONS

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- (a) **“Act”** means the Companies Act, 2013 & rules made thereunder.

- (b) "**Applicable Law**" means any law, rules, regulations, circulars, guidelines or standards applicable on the Company under which any guideline / provision with regard to the preservation of the Documents has been prescribed.
- (c) "**Authorised Person**" means the functional head of the concerned department or any person duly authorised by the Board.
- (d) "**Company**" means Glottis Limited.
- (e) "**Document(s)**" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record (including required under or in order to comply with the requirements of any Applicable Law) maintained on paper or in Electronic Form and does not include multiple or identical copies.
- (f) "**Electronic Form**" means maintenance of documents in any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other digital 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.
- (g) "**Maintenance**" means keeping documents either physically or in electronic form.
- (h) "**Policy**" means Policy for Preservation of Documents.
- (i) "**Preservation**" means to keep in good order and to prevent from being altered, damaged or destroyed.

#### **4. PRESERVATION OF DOCUMENTS / RECORDS**

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

- (i) All statutory records required to be maintained under any applicable law/ or under any directions or instructions from any statutory or regulatory authority shall be preserved for the period.
- (ii) All documents relating to any show cause notice, demand notice, order, decree, direction from any court, tribunal, or any judicial or administrative authorities shall be preserved for a minimum period of eight years from the date of disposal of the matter.
- (iii) Documents, in respect of which no minimum maintenance timeline is stipulated under any of the law shall be preserved.
- (iv) Copies of all material licenses for conducting business of the company should be preserved permanently.

#### **5. CUSTODY OF DOCUMENTS**

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- (i) All documents shall be under the proper custody of concerned functional head(s) or such other officer or employee as assigned by him as Authorised Person.
- (ii) It shall be the responsibility of the concerned head of department or Authorised Person to keep the annexed Documents Preservation schedule updated from time to time to ensure that it is in compliance with the various Acts/Rules/Regulations applicable to their respective departments and for this purpose, they shall communicate any changes desired in the abovementioned schedule to the Company Secretary.
- (iii) The concerned head of department shall keep in his custody the documents which are of important and/or confidential nature and list of the same shall be maintained in a register to be kept in his/her custody and he/she shall be responsible for the preservation of the same. The said documents along with the register shall be handed over by him/her to the successor in the event of such head of department leaving the Company/department.

- (iv) All documents can be maintained by the Company in physical or electronic or digital mode, if permitted under the applicable Acts/Rules/Regulations.
- (v) All digital records/ scanned copies of physical records may be stored or preserved in such servers in the control of system administrator or any cloud-based servers as may deem fit by the Authorised Person, which can be retrieved at any time during the preservation period.
- (vi) An employee, who seeks relieve from the company, shall transfer all digital records in his/her control to system administrator before relieving him/her from the service of the company subject to the satisfaction of concerned functional heads.

#### **6. DISPOSAL AND DESTRUCTION OF RECORDS**

- (i) All physical records not required to be preserved permanently under any law for the time being in force may be either destroyed or converted to electronic format, after the minimum preservation period of eight years subject to the discretion of the functional heads or the Authorised Person. All electronic records shall be preserved permanently.
- (ii) The Company shall maintain registers wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the concerned functional heads or Authorised Person, after obtaining prior approval of managing director of the Company.
- (iii) The register of the documents destroyed shall be produced whenever required by the concerned authority/auditors.
- (iv) Where the Company has been served with any notice requisitioning documents from any of the regulatory and statutory authorities or any litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed-off finally.
- (v) The IT department shall make appropriate provision for back up for electronic documents. In the event that it is necessary to manually dispose of an electronic document, the IT Department shall use the “Permanent Delete” function to permanently dispose of electronic documents.

#### **7. DISCLOSURE**

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The above Policy and subsequent amendments thereto shall be disclosed on the Company’s website.

#### **8. IMPLEMENTATION AND REVIEW OF THE POLICY**

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The Board shall be responsible for implementation and review of this Policy in whole or part. Any amendment or waiver of any provision of this Policy should be approved by the Board of Directors of the Company. In the event of any conflict between the provisions of this Policy and applicable laws, the provisions of applicable laws shall prevail and the part(s) so repugnant shall be deemed to be severed from the Policy and the rest of the Policy shall remain in force. Any subsequent amendment/ modification in the Applicable Laws shall automatically apply to this Policy.

***Effective Date: August 31, 2024***