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***Archival Policy***  
***(Policy on preservation of documents)***

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**NOVA AGRITECH LIMITED**

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**Archival Policy**  
**[Policy on preservation of documents]**

**INTRODUCTION**

In terms of Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, every listed Company is required to disclose on its website all such events or information which has been disclosed to the Stock Exchange(s) and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website and pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Company is required to have a policy for the preservation of documents.

Accordingly, the Company has framed this policy ("Policy") and the same shall be available at the website of the Company at [www.novaagri.in](http://www.novaagri.in).

**OBJECTIVE OF THE POLICY**

The purpose of this Policy is to ensure the preservation and archival of documents and records of the Company in compliance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandates that a listed entity shall have a policy for the preservation of documents approved by its board of directors, classifying them in at least two categories as follows:

- ✚ Documents whose preservation shall be permanent in nature (Annexure-A);
- ✚ Documents with a preservation period of not less than eight years after completion of the relevant transactions (Annexure-B).

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Further, pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall disclose on its website all such events or information which has been disclosed to stock exchanges(s) under Regulation 30 and such disclosure shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company.

Besides the above, as per the applicable provisions of the Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

### **AUTHORITY & RESPONSIBILITY**

- ✦ The functional head of the concerned department shall be responsible to maintain and destroy the records according to the time frame prescribed in the Policy.
- ✦ Each of the departments is responsible for keeping track of the location and contents of all documents for which they are responsible.

### **MODE OF PRESERVATION**

- ✦ Records / documents may be preserved either physically or in electronic form.
- ✦ The preservation location for physical documents will be the concerned department. If the location is other than the concerned department, the same may be documented and kept in a file for reference purposes in the respective department.
- ✦ In case of critical documents which need to be preserved for very long periods or permanently, the same will be preserved in good condition and stored safely.
- ✦ The preservation location for electronic documents will be the computer systems, data storing devices, server of the Company having appropriate security and safety measures.
- ✦ The preservation of documents should be such to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.
- ✦ The preserved documents shall be accessible at all reasonable times. Access may be controlled by the respective functional head of the concerned department, so as to ensure integrity of the documents and prohibit unauthorized access.

### **DOCUMENTS TO BE MADE AVAILABLE ON THE WEBSITE OF THE COMPANY**

- ✦ As required under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall maintain a functional website containing:
  - ✓ The basic information about the Company,
  - ✓ All Information and / or documents as specified in Regulation 46(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015,

- ✓ All Information and / or documents as mentioned in Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 on Material Events,
- ✓ All Information and / or documents as specified in the applicable provisions of the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- ✚ The Company shall ensure that the contents of the website are correct.
- ✚ The Company shall update any change in the content of its website within two working days from the date of such change in content.
- ✚ The information and/or documents uploaded on the website shall be available for the current financial year and for the preceding five financial years.

### **DISPOSAL OF REGISTERS/ DOCUMENTS**

Unless required to be preserved for a particular purpose like litigation or regulatory directive and upon expiration of the specified period of time for preservation as per applicable laws and/or SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the document may be destroyed by the Company.

The functional head of the concerned department shall be responsible for taking into account the potential impact on preservation/destruction of the documents in their work area and their decision to retain/preserve/ destroy documents pertaining to their area of work. The modes of destruction of records can include methods like shredding, recycling, delete or destroy electronically stored data etc. or any other mode as permissible by law.

### **AMENDMENT**

The Board (including its duly constituted committees wherever permissible), shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy. This Policy shall automatically stand amended to reflect any changes to the SEBI Regulations or Companies Act, 2013, to the extent the same is the subject matter of this Policy.

**[This Policy is approved and adopted by the Board of Directors in their meeting held on February 27, 2023]**

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**DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE**

S. No.	Particulars
1)	Documents and information filed with ROC for Incorporation of the Company
2)	Common seal, certificate of incorporation and certificate of change of name, if any)
3)	Memorandum of Association and Articles of Association as amended from time to time
4)	Agreements made by the Company with the Stock Exchanges and Depositories, etc.
5)	Minutes Books of General Meetings, Board and Committee Meetings
6)	Licenses, Certificate and permissions obtained from any statutory authority
7)	Order from Courts and any other regulatory authorities, intellectual property documents
8)	Statutory registers required to be maintained under various applicable laws
9)	Statutory forms except for routine compliance
10)	Files relating to premises for instance Title Deeds / Lease Deeds of owned premises / land and building, etc. and related Ledger/ Register
11)	Policies of the Company framed under the Companies Act, 2013 and various regulations from time to time
12)	Any other documents as may be required to be maintained in terms of applicable law(s) and preserved from time to time

**DOCUMENTS WHOSE PRESERVATION IS NOT PERMANENT IN NATURE**

S. No.	Particulars	Preservation Period
1)	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
2)	Attendance Register of Board, Committee and General Meeting	8 years
3)	Income tax papers	8 years from the end of the Financial Year Or completion of assessment under income tax, whichever is later
4)	Notices of Board, Committee and General Meetings/other such meetings and supporting documents all other	8 years from the date of meeting
5)	Employees Information Records	8 years after resignation / separation
6)	Disclosure of interest by the Directors	8 Years
7)	Instrument creating a charge or modification	8 Years
8)	Books of accounts and financial statements etc.	8 Years
9)	Any other important documents including tax filling And papers, project documents and any other such documents and papers	8 Years
10)	Scrutinizer's report	8 Years
11)	Structured Digital Database as per SEBI (Prohibition of Insider Trading) Regulations, 2015 after completion of the relevant transactions and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.	8 Years

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