

# **QUADRANT FUTURE TEK LIMITED**

## **POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS**

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## 1. BACKGROUND

Pursuant to the provisions of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 ('SEBI Listing Regulations'), the Board of Directors of QUADRANT FUTURE TEK LIMITED ('the Company') has approved a Policy on Preservation and Archival of Documents ('Policy')

The purpose of this document is to establish a policy for preservation of documents in compliance with Regulation 9 of the SEBI Listing Regulations, ensuring adequate protection and preservation as per applicable laws.

Further, In accordance with Regulation 30(8) of the SEBI Listing Regulations, the Company shall host all events or information disclosed to stock exchanges under Regulation 30 on its website for a minimum period of five years, and thereafter as per the Company's archival policy.

Additionally, this policy aims to provide a framework for archiving disclosures made on the website for information and events communicated to stock exchanges under Regulation 30 of the SEBI Listing Regulations.

## 2. DEFINITIONS

**"Act"** means the Companies Act, 2013 including any amendment or modification thereof.

**"Authorized Person"** means the officer(s) of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents.

**"Board of Directors"** or **"Board"** means the Board of Directors of Quadrant Future Tek Limited, as constituted from time to time.

**"Company"** means Quadrant Future Tek Limited.

**"Company Secretary and Compliance Officer"** means the Company Secretary and Compliance Officer as appointed by the Board of Directors.

**"Documents"** means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act, 2013, SEBI Act, 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.

**"Policy"** means this Policy on Preservation and Archival of Documents formulated by the Company.

**"SEBI Listing Regulations"** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015,

### 3. SCOPE AND APPLICABILITY

All Documents of the Company shall be maintained in compliance with the requirements of the applicable laws, including the SEBI Listing Regulations. Preservation and Archival of the Documents shall be as per the Policy.

In the event of any conflict between the provisions of this policy and the laws which are applicable on the Company, the provisions of such applicable laws shall prevail over this Policy and the part(s) so repugnant shall be deemed to served from the policy and the rest of the Policy shall remain in force.

The Policy shall become effective from date of listing of securities of the Company on the stock exchange.

### 4. CLASSIFICATION OF DOCUMENTS

**For the purpose of the Policy, the Documents of the Company are classified as follows:**

- a. The list of Documents which shall be permanently preserved is given in “**Annexure A**” to this Policy. The Company shall permanently preserve these Documents subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.
- b. The list of Documents which shall be preserved for a period not less than 8 years after completion of the relevant transaction is given in “**Annexure B**” to this Policy. The said Documents shall be preserved subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

### 5. MODES OF PRESERVATION

The Authorized Person shall:

- a. Preserves the Documents either in physical form or electronic form;
- b. Preserves the Documents in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents;
- c. Ensure that the preserved Documents are accessible at all reasonable times;
- d. Control access for preserved Documents, to ensure integrity and confidentiality of the Documents and prohibit unauthorized access;
- e. Make appropriate provisions for back up of all preserved Documents, both physically and electronically.

## **6. DESTRUCTION OF DOCUMENTS**

The preserved Document can be destroyed after the expiry of preservation period as mentioned in this Policy with the approval of the Board, in cases where the approval of Board is mandated by any law or regulations for the time being in force, or by the Head of the Department. Authorised Persons should keep proper records of documents destroyed.

## **7. ARCHIVAL PROCESS**

Any disclosures of events of information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the disclosure and shall thereafter be archived for a period 3 years.

## **8. DISSEMINATION OF POLICY**

This policy shall be hosted on the website of the Company.

## **9. AMENDMENT**

Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. Any subsequent amendment/modification in the Act or the rules framed thereunder or the SEBI Listing Regulations and/or any other laws in this regard shall automatically apply to this Policy.

## **10. COMPLIANCE**

The Authorized person shall be responsible for supervision of the Policy. Any queries regarding the Policy shall be referred to the Authorized Person, who is in charge of administering, enforcing and updating the Policy.

## **11. INTERPRETATION**

In any circumstances where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule regulation or standard shall take precedence over these policies and procedures until such time as this policy is changes to conform to the law, rule, regulation or standard.

## **12. VERSION HISTORY**

<b>S.NO</b>	<b>VERSION</b>	<b>EFFECTIVE DATE</b>	<b>DESCRIPTION</b>
1	1	Date of Listing of shares of the Company with the Stock Exchanges	ORIGINAL POLICY

## **ANNEXURE A**

### **Documents / Record whose preservation shall be permanent in nature**

<b>S no.</b>	<b>Documents/ Records</b>
<b>01</b>	Certificate of Incorporation
<b>02</b>	Memorandum and Articles of Association
<b>03</b>	Agreements made by the Company with stock exchanges, depositories, etc
<b>04</b>	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act and as per the applicable Secretarial Standards
<b>05</b>	Register and Index of Members
<b>06</b>	Register of Contracts as per Companies Act
<b>07</b>	Register of Charges as per Companies Act
<b>08</b>	Register of Investments as per Companies Act
<b>09</b>	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
<b>10</b>	Authorization / licenses obtained from any statutory authority
<b>11</b>	Policies of the Company framed under various regulations
<b>12</b>	Register of disposal of records
<b>13</b>	Annual Reports of the Company
<b>14</b>	Material Agreements of the Company
<b>15</b>	Register of loans, guarantees, security and acquisition
<b>16</b>	Such other records as may be required under any law from time to time

## **ANNEXURE B**

### **Documents / Records to be preserved for a minimum period of Eight Years**

<b>Sr no.</b>	<b>Documents/ Records</b>
<b>1.</b>	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act
<b>2.</b>	Annual Returns as per Companies Act
<b>3.</b>	Register of Deposits as per Companies Act
<b>4.</b>	Register of Allotment (from the date of each allotment) as per Companies Act
<b>5.</b>	Annual financial statements including: - Annual accounts - Directors report - Auditors report
<b>6.</b>	Books of accounts including Vouchers / Voucher register as defined under the Companies Act
<b>7.</b>	Income Tax Returns filed under Income Tax Act, 1961
<b>8.</b>	All notices in form MBP-1 received from Directors and KMPs along with any amendment thereto
<b>9.</b>	Return of declaration in respect of beneficial interest in any share as per Companies Act
<b>10.</b>	Copy of newspaper advertisement or publications
<b>11.</b>	Compliance Reports received from any statutory authority
<b>12.</b>	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
<b>13.</b>	Disclosure/Return filed under SEBI Listing Regulations
<b>14.</b>	Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers
<b>15.</b>	Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM)
<b>16.</b>	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 transaction under the Companies Act and/or the SEBI Listing Regulations