



## **APT PACKAGING LTD**

**Date of adoption of policy:- 14, February, 2023**

### **POLICY ON MAINTENANCE & PRESERVATION OF DOCUMENTS**

#### **1. PREAMBLE:**

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (Hereinafter called as “The Regulations”) every listed Company shall frame a policy on preservation of documents.

#### **2. OBJECTIVE:**

This policy *inter alia* provides for preservation of documents so that records should be kept no longer than the period necessary for the proper conduct of Company business. This policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records.

#### **3. DEFINITIONS**

- a) Applicable Law: “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.
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- b) Company: "Company" means APT PACKAGING LIMITED.
- c) Document(s): "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.
- d) Electronic Form: "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 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.
- e) Preservation: "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.

#### 4. CLASSIFICATION OF DOCUMENTS:

As per the guidelines issued by National Archives India, the records are classified into following three categories:

##### "A - keep" Category

Records under this category are meant for permanent preservation and are to be microfilmed because they contain

- (i) a document so precious that its original must be preserved intact and access to it in the original form must be restricted to the barest minimum.
- (ii) Material likely to be required for frequent reference by different parties.

##### "B - keep" Category

Records under this category are also meant for permanent preservation but they are not to be microfilmed.

##### "C- keep" Category

Records under this category are meant to be maintained for a limited period not exceeding 10 years. There are four sub-categories in the category C, i.e. C-1, C-3, C-5 and C-10.

In addition to above, various documents are required to be mandatorily maintained & preserved for a stipulated minimum period of time under the various laws.

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## 5. PRESERVATION OF DOCUMENTS / RECORDS

All statutory records required to be maintained under any law shall be preserved for the period, if any, prescribed there under.

## 6. CUSTODY OF DOCUMENTS

All documents shall be under the custody of concerned functional head(s).

## 7. DESTRUCTION OF DOCUMENTS

After retention period, concerned functional head shall decide the records which are to be destroyed. A list of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. Before destruction of documents, the concerned head of department may opt for preserving copies of the same in Electronic Form.

## 8. ARCHIVAL POLICY

The policy applies to documents / information hosted on the website of the company including events/information required to be disclosed on website under SEBI Regulations. The disclosure of material events shall be hosted and retained on the Company's website for a minimum period of 5 (five) years. Thereafter depending upon the nature, materiality, impact and relevance of the material event/ information, the disclosure of such material event:

- a) can continue to remain hosted on the Company's website for a longer period of time on the advice of concerned functional head to Corporate Communication can be removed from the website or
- b) can be archived.

## 9. AMENDMENTS TO THE POLICY

The Managing Director is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Regulation and other applicable laws.

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