

ATHENA GLOBAL TECHNOLOGIES LIMITED

CIN: L74140TG1992PLC014182

POLICY FOR PRESERVATION OF DOCUMENTS

AND ARCHIVAL POLICY

*[Under Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015]*

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POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

[Under Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. PURPOSE AND SCOPE

- The purpose of this document is to present a policy statement for ATHENA GLOBAL TECHNOLOGIES LIMITED (Company) regarding preservation of its documents and archival of documents in accordance with the provisions of the Companies Act, 2013 and Regulations 9 and 30(8) of Chapter III & IV of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, (LODR Regulations).
- The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

- The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:
- Documents whose preservation shall be permanent in nature;
- Documents whose preservation period shall not be less than eight years after completion of the relevant transactions;
- Documents whose preservation shall be for a minimum period of three years after completion of the event.

The details of documents for the above three categories are given in the **Annexure**.

3. PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

- All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

4. PERIODICAL REVIEW OF THE POLICY

- The Managing Director/Chief Executive Officer/Company Secretary of the Company is authorized to periodically review the policy and make such changes as considered necessary.

5. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

- In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

6. STATUTORY REQUIREMENTS

- If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

7. WEB ARCHIVAL POLICY

- The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s).
- Such disclosures shall be retained on the website of the Company for a minimum period of five years.
- At the end of the fifth year the information shall be archived and preserved for a further period of three years.

ANNEXURE

A. Documents whose preservation shall be permanent in nature:

NO.	DOCUMENT
1	Incorporation documents
2	Memorandum and articles of association
3	Register of members along with the index
4	Register of sweat equity shares
5	Register of directors and key managerial personnel
6	Register of renewed and duplicate share certificates
7	Register of employee stock option
8	Register and index of beneficial owners
9	Register of shares or other securities that have been bought back
10	Share certificate forms and related books and documents – disputed cases
11	Register of charges
12	Register of loans, guarantees, security and acquisition
13	Register of investments made by the Company not held in its name
14	Register of contracts or arrangements in which directors are interested
15	Foreign register of members
16	Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board, creditors, committees of the Board and resolutions passed by circulation.
17	Register of transfer and transmission of shares
18	Statutory Clearances, Annual Returns, Assessment Orders, Loan Documents, Security Documents, Guarantee Documents, Investment Documents, Management Consultancy Agreements, Stock Exchange Listing Permissions etc.
19	Forms and returns filed with the Registrar of Companies, Ministry of Corporate Affairs, SEBI or any other regulatory authority
20	Any court/ NCLT orders
21	Certificates issued by the Registrar of Companies
22	Other statutory registers and documents maintained by the Company under various laws applicable to the Company or as prescribed by the Board from time to time.

B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions (but need to be preserved in electronic form permanently):

NO.	DOCUMENT
1	Books of account including relevant books and papers and financial statements
2	Disclosures/ notices by a director of his interest
3	Register of deposits
4	Instrument creating a charge or modification
5	Annual return and copies of all certificates and documents required to be annexed thereto
6	Register of debenture holders
7	Postal ballot forms
8	Correspondence with shareholders
9	Tax records
10	Disclosures – SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
11	Disclosures – SEBI (Prohibition of Insider Trading) Regulations, 2015
12	Protected Disclosures in writing or documented along with the results of investigation relating thereto (including the Investigation Report) as reported under the whistleblower policy
13	Other statutory registers and documents maintained by the Company under various laws applicable to the Company or as prescribed by the Board from time to time.

C. Documents whose preservation shall be for a minimum period of three years after completion of the event (but need to be preserved in electronic form permanently):

NO.	DOCUMENT
1	Tender Documents, if any
2	Lease Deeds and Contracts, if any.
3	Legal files
4	Insurance Records including policies and claims
5	All e-mail correspondence, internal & external
6	Documents under Secretarial Standards • Proof of sending Notice of the meetings of the Board / Committee and General meetings and its delivery • Proof of sending Agenda and Notes on Agenda and their delivery • Proof of sending and

NO.	DOCUMENT
	delivery of the draft of the Resolution • Proof of sending draft Minutes and its delivery • Proof of sending signed Minutes and its delivery
7	Any other record as may be decided by the Chief Executive Officer of the Company from time to time.

Amendments to the Policy

Any amendments or modifications thereon, as may be required from time to time, in the policy shall be approved by the Board of Directors and shall have effect from the date of such amendment.