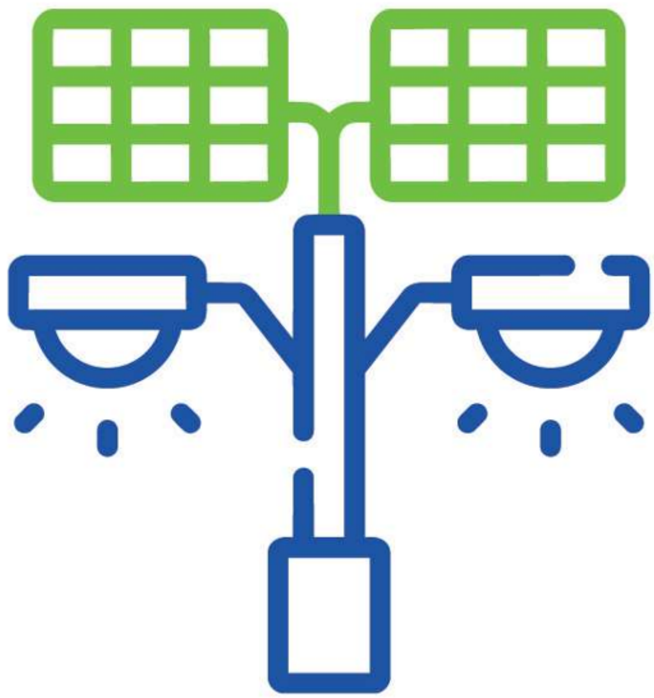
AVAADA
ELECTRO



Preservation of Documents and Archival Policy

AVAADA ELECTRO LIMITED

PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

1. Background

Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**SEBI Listing Regulations**") refers to an archival policy as per which, all events or information which has been disclosed to stock exchange(s) under Regulation 30 of the SEBI Listing Regulations shall be hosted on the website of Avaada Electro Limited for a minimum period of five years and thereafter as per the archival policy of the Company, which will be disclosed on its website i.e. https://avaadaelectro.com/

2. Purpose

The purpose of this document is to formulate a policy for archival of the disclosures made on the website for information and events communicated to the stock exchanges under Regulation 9 and 30 of the SEBI Listing Regulations. The Company makes this Policy on preservation of the documents inter alia to aid the employees in handling the documents efficiently either in physical form or in electronic form. It covers the various aspects on preservation of the documents, archival of the same and safe disposal/destruction of the documents.

3. Definitions

"**Applicable laws**" means securities laws defined under Regulation 2(1)(zf) of the SEBI Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

"**Board**" means board of directors of the Company as constituted from time to time.

"**Company**" means Avaada Electro Limited

"**Company Secretary and Compliance Officer**" means the company secretary and compliance officer appointed by the Board.

"**Document/s**" includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

"**Effective Date**" means the date on which such Policy shall become effective i.e. October 15, 2025

"**Managing Director**" means the managing director appointed by the Board and the shareholders of the Company.

"**Policy**" means this policy formulated by the Company for archival of the disclosures made on the website relating to information and events communicated to stock exchanges.

4. Custody of the Documents

4.1 Head of concerned department (HOCD) of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

4.2 Subject to the Applicable Law, the custody of the Documents shall be with the relevant Authorised Person. Where the Authorised Person tenders his resignation or is transferred from one location of the Company to another or is otherwise no longer employed with the Company, such person shall hand over all the relevant Documents, lock and key, access control or password, or company disc, other storage devices or such other Documents and devices in his possession under the Policy to the new HOCD. Information of the cessation or transfer of the Authorised Person shall also be intimated to the Company Secretary and information technology department of the Company.

The Authorised Person will co-ordinate with the Information Technology (IT) Department of the Company to ensure Preservation of Documents in electronic form, as appropriate.

Notwithstanding anything contained elsewhere in the Policy but subject to the requirements of Applicable Law, the Authorised Person may (subject to final approval from the HOCD) permit other means of storage including usage of a third party service provider or a centralized system of storage for the Preservation of Documents.

4.3 Notwithstanding anything contained above, where any Documents are required to be maintained at the registered office of the Company, then they shall be maintained at such place.

5. Archival Process

i. All the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations will be hosted on the website of the Company under the section entitled "*Investor Relations*" for a period of five years, and thereafter the same shall be archived so as to be available for retrieval for such period as may be decided by the Authorised Person of the Company.

ii. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company.

iii. This policy will be periodically reviewed by the Board and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes. The Company Secretary, being the Compliance Officer, is also authorized to make amendments in this Policy, where there is any statutory changes necessitating the amendment in the Policy.

iv. In the event of any conflict between the provisions of this Policy and of the Applicable Laws, the provisions of Applicable Laws shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Laws shall automatically apply to this Policy.

v. Adoption of this policy shall be communicated to the stock exchange(s) where the Company's equity shares are listed. This policy shall also be disclosed on the website of the Company.

6. Destruction of Documents

6.1 Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both physical and electronic Documents.

6.2 Documents shall be disposed as follows:

6.2.1 Class I Documents cannot be disposed without the approval of the Board.

6.2.2 Class II Documents may be disposed off after the time prescribed under Applicable Law has lapsed, with the prior approval of the Authorised Person.

6.3 The Authorised Person shall exercise due diligence while destroying any Documents, including seeking confirmation from other relevant departments or external consultants to the extent necessary.

6.4 A register 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. The entries in the register shall be authenticated by the Authorised Person.

6.5 The format of the register has to be in accordance with Annexure B.

6.6 The functional head of the IT department shall make appropriate provision for back up for Electronic Records.

6.7 The relevant Authorised Person shall forthwith inform the Company Secretary and the HOCD of any damage or inadvertent destruction of any Document.

ANNEXURE A

a. Class I - Documents

i) Records as per Companies Act

• The Memorandum and Articles of the Company

• Certificate of Incorporation

• Affidavit from the subscribers to the Memorandum and from persons named as the First Directors

• Register and Index of Members (MGT-1)

• Listing Agreement with Stock Exchanges

• Forms filed with Registrar of Companies (ROC)

• Register of Renewed and Duplicate Share Certificate (SH-2)

• Books and Documents relating to the issue of share certificates, including the blank forms of share certificates

• Annual Return

• The Foreign Register of Members

• Register of Charges (CHG-7)

• Minutes Book of General Meeting, Board Meeting and Committee Meeting.

• Register of particulars of loans and guarantee given, securities provided & acquisition of securities made by the Company (MBP-2)

• Register of Directors, Managing Director, Manager and Secretary

• Register of Director's Shareholding

• Register of transfer of shares

• Register of transmission of shares

• Register of Investments not held in its own name by the Company (MBP-3)

• Register of Contracts with Related Party and Contracts and Bodies etc. in which Directors are interested (MBP-4)

• Various licenses and permits/approvals received by the Company wrt the business of the Company.

ii) Accounts and Finance Records

• Annual Audited Financial Statements

Quarterly Audited Financial Statements

b. Class II Documents

• Instrument Creating a Charge or modification thereon (8 years from the date of satisfaction of charge)

• Instrument Creating a Charge or modification thereon (8 years from the date of satisfaction of charge)

• Resolutions passed by Circulation

• Register of Debenture Holders or any other security holders (8 years from the date of redemption of debentures or securities) (MGT-2)

• Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)

• Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)

• All notices pertaining to disclosure of interest of directors (MBP-1)for a period of 8 years from the end of the financial year to which it relates)

• All certificates surrendered to a company (3 years from date of surrender)

• Register of deposits (not less than 8 years from the date of last entry)

• Instrument creating a charge or modification (8 years from date of satisfaction of charge)

• The postal ballot and all other papers relating to postal ballot including voting by electronic means (as long as they remain current or for8 financial years), whichever is later.

• All books and documents relating to the issue of share certificates, including the blank forms of share certificates not less than 30 years

• Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode (8 Financial years) (SS-1)

• Copies of Notices, Agenda, Notes on Agenda and papers related to Board Meeting. (8 Financial Years) (SS-1)

• Disclosures under SEBI – Substantial Acquisition of Shares and Takeover Regulations, Prohibition of Insider Trading Regulations

• Office copies of Notices, Scrutinizer’s Report, and related papers (as long as they remain current or for 8 financial years), whichever later (SS-2)

ii). Accounts and Finance Records

• Books of Accounts, Ledgers and Vouchers

• Investment Records

• Engagement Letters from Auditors

iii). Tax Records

• Income Tax Returns, GST Return, etc

• Documents, Challans and other details/correspondence related to Income Tax, GST, etc.

ANNEXURE B

The list of the register of Documents disposed/destroyed –

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF APPLICABLE LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON
NIL		