



ASM TECHNOLOGIES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

(Amended and effective April 1, 2023)

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1. Introduction

The Corporate records of ASM Technologies Limited (“ASM” or “Company”) are important assets of the Company. It is the duty of every employee to keep the records in such a manner that the same is retrievable when needed and maintained in good condition and preserved till such time as mentioned below.

It is the Company’s policy to maintain complete, accurate and high quality records as per the The Companies Act, 2013 (“Act”) rules made thereunder and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended (“LODR”) and other applicable laws (hereinafter referred to as “**Relevant laws**”)

The Board of Directors of the Company is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the SEBI Listing Regulations.

Further, Regulation 30(8) of the SEBI Listing Regulations requires every listed entity to make available an archival policy on its website.

Accordingly, “policy for preservation of documents and archival policy” (“the Policy”) has been formulated.

2. Definitions

"Board of Directors" or "Board", in relation to a company, means the collective body of the Directors of the company

“Company” means ASM Technologies Limited

“Documents” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

“Policy” means policy for preservation of documents and archival policy of the Company.

Unless the context otherwise requires, words and expressions used in this Policy and not defined herein but defined in the Act and Listing Regulations as may be amended from time to time shall have the meaning respectively assigned to them therein.

3. Purpose and Objective

The objectives and purpose of this Policy is to classify the documents in two categories i.e. (i) documents which need to be preserved permanently and (ii) documents which need to be preserved for a specific period of time.

This policy establishes retention and archival schedules for various data categories defined in this policy and this policy is framed for the purpose of systematic identification, categorization, maintenance, retention and destruction of documents received or created in the normal course of business.

Pursuant to Regulation 30(8) of the SEBI Listing Regulations, records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual, legal or regulatory requirements or for other purposes as may be set forth below. Records that are no longer required, or have satisfied their required periods of retention, shall be destroyed as per the procedure prescribed under law

4. Responsibility for Administration

Compliance officer and/or the Company Secretary (“Administrator”) of the Company shall be responsible for administering the Policy.

5. Maintenance of Records

The documents of a permanent nature listed below shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time in compliance with the laws. Also all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

1. Registration Certificate
2. Memorandum and Articles of the Company
3. Affidavit from the subscribers to the memorandum and from person named as the first directors
4. Statutory Registers required under applicable laws
5. Audited financial statements
6. Minutes of Board/General/Committee Meetings
7. Material Agreement/Contract
8. Order issued by Courts/Statutory Bodies
9. Any other documents as may be require to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions listed below shall be preserved by the Company for the term not less than eight years after completion of the relevant transaction subject to the modifications, amendments, additions, deletions or any changes made therein from time to time in compliance with the laws. Also all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

1. Books of Accounts
2. Annual Return(s)
3. Personnel Documents
4. Insurance Policies/Claims under various
5. All notices pertaining to disclosure of interest of directors
6. Correspondence with Department/Shareholders
7. Non-Statutory Registers/Documents
8. Certificates surrendered to a Company
9. Instrument creating a charge or modification
10. Films, Video, CDs, DVDs, etc
11. Any other documents as may be require to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

6. Archival

- ❖ The document and records which are no longer current, but which are required to be preserved for a specified period of time or permanently under the applicable laws/ rules/ regulations shall be archived by the Company.
- ❖ Every Function/Unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy.
- ❖ Every Function/Unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- ❖ The documents and records may be archived in physical and/or electronic mode and shall be stored in the premises of the Company or with an approved warehousing agency in case of physical documents and on the server of the Company and/ or the server of any third party vendor/ service provider in case of electronic documents having appropriate security and safety measures.

- ❖ The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

7. Privacy

It shall be the responsibility of the Administrator, to determine how privacy laws will apply to the Company's documents from and with respect to employees and other constituencies; to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.

8. Suspension of Records Disposal in the Event of Litigation/Claims

In the event the Company is served with any notice for documents from any statutory authority or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of notice/litigation, etc. shall be suspended until such time the matter is settled or resolved or disposed off. The company secretary shall immediately inform all employees of the Company for suspension of further disposal of Documents.

9. Destruction of Records

The records/ documents preserved shall be reviewed every year or according to the need of the respective departments and actions taken to destroy those records which are due for disposal.

10. Communication of this Policy

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the intra-net site of the Company.

11. Review and amendments

Any subsequent amendment/modification in the Act or the Rules framed thereunder or the SEBI Listing Regulation and/or any other laws in this regard the statutes would prevail over the Policy and shall automatically apply to this Policy. The Board of Directors reserves its right to amend or modify the policy in whole or in part, at any time without assigning any reason whatsoever.

Note: This policy has been approved by the Board of Directors of the Company at their meeting held on 8th February 2023 and shall be effective from 1st April 2023.