Glittek Granites Limited

POLICY ON PRESERVATION OF RECORDS AND ARCHIVAL POLICY

Under Regulation 9 read with Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

POLICY ON PRESERVATION OF RECORDS

1) PREAMBLE

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 **("SEBI Listing Regulations")**, read with Regulation 30 of the SEBI Listing Regulations, requires every listed company to formulate a policy on preservation of documents. During the course of business, the company generates several records either in physical or in electronic modes, most of the records are useful for a shorter span of time, hence such records are kept for a definite period of time, but some records may be needed to be kept permanently during the lifetime of the organization.

In accordance with the abovementioned Regulations, the Company has formulated a Policy for Preservation of Documents and Archival Policy **("Policy")** of Glittek Granites Limited ("Company"). The Policy is framed in line with the existing provisions of Listing Regulations. Any future changes in the Listing Regulations will, ipso facto, apply to this Policy.

2) SCOPE

This policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records. The policy ensures that the Company maintains both physical and electronic records/ documents preserved for such minimum period as required by the law for the time being in force. All records must be kept, keeping in mind the confidentiality and nature of the documents.

3) DEFINITIONS

a) **"Act"** means the Companies Act, 2013 or any previous company law (to the extentthe provisions there under are in force) and Rules framed there under, including any amendments, modifications, clarifications or re-enactment thereof, for the time beingin force.

b) "**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.

c) **"Articles"** means the articles of association of a company as originally framed or as altered from time to time or applied in pursuance of the Act.

d) **"Book and Paper"** and "book or paper" includes books of account, deeds, vouchers, writings, documents, minutes and registers maintained on paper or in electronic form.

e) **"Books of Account"** includes records maintained in respect of—

i. all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place;
ii. all sales and purchases of goods and services by the company;
iii. the assets and liabilities of the company; and
iv. the items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section.

f) **"Board of Director or Board"** means Board of Directors of the Company.

g) "**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.

h) "**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.

i) **"Memorandum"** means the memorandum of association of a company as originally framed or as altered from time to time in pursuance of any previous company law orof this Act.

j) **"Policy"** means this Policy for Preservation of Documents and schedules appended thereto.

k) "**Preservation**" means to keep in good order and to prevent from being altered, damaged or destroyed.

4) PRESERVATION / ARCHIVAL OF DOCUMENTS / RECORDS

As per the Policy, the Company shall maintain and preserve register and records,books and/or paper, books of accounts and other documents etc. as follows:

a. Schedule I - to be preserved permanently;
b. Schedule II - to be preserved for eight years;
c. Schedule III – to be preserved for a period of five years or such higher period as may be determined by the Board of Directors or a Committee thereof.

Documents to be maintained under this Policy shall be preserved in Physical or in Electronic Form/Mode as per the provisions of the Act / Rules / Regulations.

Documents not covered under the schedules above may be preserved for the period as prescribed under the relevant statute. In absence of any such provisions therein, such documents shall be preserved for less than five years, provided however that approval of the Board or Committee thereof shall be taken before destruction of such documents.

All such events or information that has been disclosed to stock exchange(s) under Regulation 30 of SEBI Listing Regulations shall be hosted on the Company's Website for a period not less than five (5) years, after which the same may be archived.

The records shall be preserved/ maintained at the Registered Office of the Company unless any other law requires it to be maintained at any other place.

5) CUSTODY OF DOCUMENTS

a) All Documents shall be under the proper custody of concerned functional head(s) or such other officer or employee as assigned by him.

b) All confidential Documents should be kept under safe custody.

c) All digital records/ scanned copies of physical records may be stored or preserved in such servers in the control of system administer or any cloud-based servers as may deem fit by the functional heads, which can be retrieved at any time during the preservation period. An

employee, who seeks relieve from the Company, shall transfer all digital records in his/her control to system administrator before relieving him/her from the service of the company subject to the satisfaction of concerned functional heads.

6) DISPOSAL AND DESTRUCTION OF RECORDS

The documents specified in Schedule II & III to this Policy, kept by the Company, may be destroyed after the expiration of the periods specified in the respective Schedules. However, approval of the person authorised by the Board in this regard, shall be taken before such destruction. In general, if no person is authorised at any point of time, managing director of the Company is considered as deemed authorised person.

7) REGISTER OF DOCUMENTS DESTROYED

The Company shall maintain a register for documents destroyed as per this Policy. The Register of Documents Destroyed shall contain brief particulars of the documents destroyed, date and mode of destruction and all entries made therein shall be authenticated by the Secretary or such other persons as may be as authorized by the Board for the purpose.

8) DISCLOSURE

This Policy will be communicated to all employees and other concerned persons of the Company and be disclosed on the Company's website at Policies - Glittek.

9) REVIEW OF THE POLICY

The Board shall review Policy periodically. However, all such amendments will be subject to Applicable Law, rules and regulations, from time to time.

10) EFFECTIVE DATE

This Policy shall come into effect on November 1, 2026

SCHEDULE I
(Documents to be preserved permanently)

Sr. No.	Name of Documents	Period specified underthe law
1.	All Documents and Information as originally filed with the Registrar of Companies for Incorporation of Company *[Section 7(1)]*.	Permanent
2.	Memorandum and Articles of Association, dulyupdated from time to time *[Section 15]*	Permanent
3.	Register of Renewed and Duplicate Share Certificate (Form SH-2) *[Section 46 & Rule 6(3) of Chapter IV]*	Permanent
4.	Books and documents relating to the issue of share certificates including blank forms of share certificates *[Section 46 and Rule 7 of Chapter IV]*	Thirty years. But in case of disputed cases, permanently.
5.	Register of Transfer and Transmission *[Section56]*	Permanent
6.	Register of Charge (Form CHG-7) *[Section 85& Rule 10 of Chapter VI]*	Permanent
7.	Register of Members including foreign register,if prepared (with index of names if no. of members is not less than 50)*(Form MGT-1)* And Record of Beneficial Owners *[Section 88 (1) (a) and Rule 3 of Chapter VII]*	Permanent
8.	Minutes of Board Meeting and other Committee Meetings of the Board and resolutions passed by Circulation Minutes of the General Meetings of class ofshareholders / creditors or resolutions passedby way of postal ballots. *[Section 118, 119 & Rule 25 of Chapter VII]*	Permanent
9.	Books and Papers of AmalgamatedCompanies *[Section 239]*. Minutes of all Meetings of the transferor company, as handed over to the transferee company. *[SS-1& SS-2]*	Permanent
10.	Register of Loan, Investments and Guarantee (Form MBP-2) *[Section 186 & Rule 12 of Chapter XII]*	Permanent
11.	Register of Investments made by Company not held in its own name (*Form MBP-3*) *[Section 187 & Rule 14 of Chapter XII]*	Permanent
12.	Register Of Contracts Or Arrangements In Which Directors are interested (*Form MBP-4*) and copy of contracts or arrangements entered into *[Section 189 & Rule 16 of Chapter XII]*	Permanent
13.	Notice of address at which books of account are maintained	Not specified
14.	Return of allotment of shares and Contract of allotment of shares fully or partly paid up otherwise than in cash and verified copies of such contract	Not specified

15.	Disclosures from Promoters and others under SEBI (Substantial Acquisitions of Shares and Takeover) Regulations, 2011 or other previously applicable Takeover Regulations of 1992	Not specified
16.	Register of Documents destroyed	Not specified

SCHEDULE II
(Documents to be preserved for minimum eight years)

Sr. No.	Name of Documents	Period specified underthe law
1.	Register of Deposits & Return of deposits & Copy of advertisement or statement in lieu of advertisement *[Section 73, 76 & Rule 14 of Chapter V]*	Eight years from the Financial Year in which latest entry is made
2.	Instrument creating Charge or Modification thereof *[Section 85 and Rule 10 of Chapter VI]*	Eight years from the date of Satisfaction ofCharge
3.	Register of Debenture Holders or othersecurity holders (*Form MGT-2*) *[Section 88 (1) (a) and Rule 4,5,6 of Chapter VII]*	Eight years after the redemption of debentures or other security holders
4.	Annual Return and copies of all certificates anddocuments required to be annexed thereto *[Section 92 and Rule 15(3) of Chapter VII]*	Eight years from the date of filing with theRegistrar
5.	Books of Accounts and Balance Sheet andProfit and Loss Statement [*Section 128(5)*]	Eight years from the close of relevantfinancial year
6.	Notice of Interest by Directors and Key Managerial Personnel *[Section 184(1) and Rule 9(3) of Chapter XII]*	Eight years from the close of the relevant financial year
7.	Attendance Register of Meetings of the Boardand Committees *[SS-1 – Clause 4.1.7]*	At least eight financialyears
8.	Office copies of Notices, Agenda, Notes on Agenda and other related papers of the transferor company, as handed over to the transferee company *[SS-1 – Clause 8.2]*	As long as they remaincurrent or for eight financial years, whichever is later
9.	Office copies of Notices, scrutiniser's report, and related papers of the transferor company, as handed over to the transferee company *[SS-2 – Clause 18.2]*	As long as they remaincurrent or for eight financial years, whichever is later
10.	Attendance register of general meeting *[Section 118 & Rule 27 of Chapter VII]*	At least eight financialyears
11.	Register of Proxies *[Section 105 & Rule 19 of Chapter VII]*	At least eight financialyears
12.	Details / statement of unclaimed dividend *[Section 124 and Rule 4 of Chapter VIII]*	At least for eights years from the relevant financial year of transfer to IEPF.

SCHEDULE III
(Documents to be preserved for minimum five years or such higher period as may be determined by the Board of Directors or Committeethereof, from time to time)

Sr. No.	Name of Documents	Period specifiedunder the law
1.	Certificates surrendered to the Company for the purposes of cancellation *[Section 46 and Rule 7 of Chapter IV]*	Three years from the date on which they are surrendered.
2.	Register of Sweat Equity Shares (Form SH-3) *[Section 54 & Rule 8(14) of Chapter IV]*	Not specified
3.	Register of Employee Stock Options (Form SH-6) *[Section 62(1)(b) & Rule 12 of Chapter IV]*	Not specified
4.	Record of Private Placements (Form PAS-5) *[Section 42 & Rule 14(3) of Chapter III]*	Not specified
5.	Register of Shares or other Securities boughtback (Form SH-10) *[Section 68(9) & Rule 17 of Chapter IV]*	Not specified
6.	Register of Directors and Key Managerial Personnel *[Section 170, 171, 172 & Rule 17 of Chapter XI]*	Not Specified
7.	Agreement / contract with the Managing orWhole-time Director *[Section 190]*	Not specified
8.	Certified copy of order of Regional Director confirming change of registered office from one place to another within a State *[Section 12 and Rule 28 of Chapter II]* or Certified copy of order of Central Government confirming change of registered office from one State to another *[Section 12 and Rule 30 of Chapter II]*	Not specified
9.	Certified copy of Resolutions for alteration of name clause, object clause or share capital clause in the Memorandum and Articles of Association and a printed copy of the document so altered *[Section 13 to 15]*	Not specified
10.	Certified copy of the order of any court or Tribunal confirming reconstruction and amalgamation of companies, Schemes, Arrangements or contract involving transfer of shares, reduction of share capital and certified copy of the order and minute, cancellation orvariation of shareholders' right, compromises and arrangements with creditors and members and copy of orders in appeal.	Not specified
11.	Listing Agreements with Stock Exchanges	Not specified
12.	Agreements with Registrar and Share TransferAgent and Depositories	Not specified
13.	Documents filed with the Ministry of Corporate Affairs, Registrar of Companies, Regional Director or Central Government but not prescribed in this Policy.	Not specified
14.	Disclosures from Promoters, Directors, Key Managerial Personnel and others under SEBI (Prohibition of Insider Trading) Regulations, 2015 *[Regulation 4]*	Minimum period of Five years