

AASTHA SPINTEX LIMITED
(Formerly known as AASTHA SPINTEX PRIVATE LIMITED)

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

[Pursuant to the Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. Introduction

- 1.1. The Board of Aastha Spintex Limited (the “**Company**”) has adopted the following policy with regard to the Preservation and Archival of documents. Regulation 9 of the Securities Exchange Board of India (“**SEBI**”) (Listing Obligation and Disclosure Requirements) Regulations, 2015 (the “**Listing Regulations**”) requires the Company to frame a policy on ‘Preservation of Documents’. Further, Regulation 30(8) requires the Company to frame a Policy on website disclosure and Archival of such disclosures.
- 1.2. As per Regulation 9 of the Listing Regulations, the listed entity shall formulate a policy for Preservation of Documents, approved by its Board of Directors, classifying them in at least two categories i.e. (a) documents whose Preservation shall be permanent in nature; and (b) documents with Preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode. The Policy has been approved by the Board of Directors in its meeting held on 08th August, 2025.

2. Effective Date

This Policy will come into effect from the date of its adoption by the Board in its meeting held on 08th August, 2025.

3. Objectives and Purpose

- 3.1. 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.
- 3.2. The objectives and purpose of this Policy is to classify the documents in the following categories:
- (a) documents whose Preservation shall be permanent in nature; and
 - (b) documents with a Preservation period of not less than eight years after the completion of the relevant transactions,

provided that the listed entity may keep documents specified in clauses (a) and (b) in Electronic Form. As per applicable provisions of Companies Act, 2013 certain documents are required to be preserved permanently or up to a certain prescribed time. Accordingly, this policy is being framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

4. Definitions

- 4.1. Except where the context otherwise requires, the following capitalized words and expressions shall have the meaning as specified hereunder:
- (a) “**Act**” means the Companies Act, 2013, and rules made thereunder, as amended from time to time;
 - (b) “**Applicable Law**” means any law, rules, regulations, circulars, guidelines or standards under which the Preservation or Archival of the Documents has been prescribed;
 - (c) “**Archive**” or “**Archiving**” or “**Archival**” is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit and preserving the historical memory and proof of an activity;
 - (d) “**Board**” in relation to the Company, means the collective body of the directors of the Company or its committee;
 - (e) “**Company**” means shall have the meaning ascribed to it in paragraph 1.1;
 - (f) “**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations,

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forms, correspondence, minutes, indices, registers and contains all relevant information relating to the Company and necessary documentations required to be maintained under the Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies;

- (g) “**Electronic Form**” means any contemporaneous electronic device such as a 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 accessible to the Company;
- (h) “**Listing Regulations**” shall have the meaning ascribed to it in paragraph 1.1;
- (i) “**Records / Documents**” includes and contains all relevant information relating to the Company and necessary documentations required to be maintained under the Applicable Law;
- (j) “**Relevant Laws**” shall have the same meaning ascribed to it in paragraph 11.2;
- (k) “**Preservation**” means to keep in good order and to prevent from being altered, damaged, or destroyed;
- (l) “**Policy**” means this Policy on Preservation of documents and Archival Policy and as may be amended from time to time; and
- (m) “**SEBI**” shall have the meaning ascribed to it in paragraph 1.1.

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

5. Type of Documents and Time Period for Preservation

5.1. Under Regulation 9 of the Listing Regulations the company shall classify the documents in below two categories:

- (a) **Category (A):** Documents whose Preservation shall be permanent in nature; and
- (b) **Category (B):** Documents with Preservation period of not less than eight years after completion of the relevant transactions,

provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

5.2. Accordingly, for the purpose of the Policy, the Documents of the Company are classified as follows:

- (a) **Category (A):** The documents of a permanent nature (listed in **Annexure A**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time, provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.
- (b) **Category (B):** The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in **Annexure B**) shall be preserved by the Company for a term not less than eight year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.
- (c) **Category (C):** In addition to the documents mentioned in category ‘A’ and ‘B’ above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing rules/ procedures/ practices of the Company or as per the applicable statutory/ regulatory provisions in this regard.

5.3. For the purpose of this Policy, document may include the following:

- (a) ‘books and papers’ as defined in clause 12 of section 2 of the Act;
- (b) ‘books of accounts’ as defined in clause 13 of section 2 of the Act;

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- (c) 'documents' as defined in clause 36 of section 2 of the Act;
- (d) 'register of company' as defined in clause 74 of section 2 of the Act.

- 5.4. Further, the company may deem it fit and possible from time to time to maintain the above-mentioned documents in electronic form to the extent possible.
- 5.5. Notwithstanding anything contained in this policy, in case of a dispute with tax authorities or government authorities, records and documents relating to the dispute will be preserved till the settlement of dispute or eight years, whichever is later.

6. Roles & Responsibility

The heads of respective departments of the Company shall be responsible for Preservation of the Documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.

7. Destruction of Documents

- 7.1. After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board/Chief Financial Officer/Company Secretary and the Compliance Officer/concerned functional director/head of the department.
- 7.2. Proper records of destruction shall be maintained for the documents so destroyed. This applies to both physical and electronic documents. The Documents may be destroyed as follows:
 - (a) Recycle non-confidential paper records;
 - (b) Shred or otherwise render unreadable confidential paper records; or
 - (c) Delete or destroy electronically stored data.

8. Storage and Archival of Records

- 8.1. The Company shall host all the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations on the website of the Company for a period of five years and thereafter the same shall be Archived for retrieval for such period as decided by the Chief Executive Officer and/or Managing/Whole-Time Director/Executive Director of the Company.
- 8.2. Any record that is no longer required in which it originated or was received, and has permanent legal, institutional or historical value, is to be Archived.
- 8.3. The documents 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.
- 8.4. 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.
- 8.5. 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.
- 8.6. Hard or scanned copies of documents, beyond their operational date, may be kept on site for reference purposes, and it will be the responsibility of the Company's information technology department to keep back-up of electronic data at an appropriate and safe location.

9. General

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional

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requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

10. Privacy

It shall be the responsibility of the Board, to determine how privacy laws shall 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.

11. Amendment

Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board shall be final and binding.

12. Interpretation

In case of any subsequent changes in the provisions of the aforementioned statutes, the statutes would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with prevailing law. Any subsequent amendment/modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.

13. Conflict of policy

In the event of any conflict between this Policy and the provisions contained in the applicable laws, the provisions of the applicable laws shall prevail.

14. Disclosures

This Policy will be disclosed on the Company's website at Aastha Spintex Limited <https://www.aasthaspintex.com/>.

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Annexure A

Documents whose Preservation shall be permanent in nature

The following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- (a) Registration Certificates;
- (b) Statutory Registers required under applicable laws;
- (c) Polices, Charters and Codes of the Company;
- (d) Minutes of the Board Meetings and Board Committees as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India;
- (e) Minutes of General Meetings (including AGMs) as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India;
- (f) Register of directors and Key Managerial Personnel;
- (g) Register of Renewed and Duplicate Share Certificates;
- (h) Share Certificate forms and related book and documents as per Rule 7(3) of Companies (Share Capital and Debenture) Rules, 2014;
- (i) Register of Charges in Form CHG-7 as per Rule 10(4) of the Companies (Registration of Charges) Rules, 2014;
- (j) Register of Members along with the index (Form MGT-1);
- (k) Register u/s 186 of the Act (loan/ guarantee/ security or making an acquisition of securities) Form MBP-2;
- (l) Register u/s 187 of the Act (investment held in the name of any other person) Form MBP-3;
- (m) Register u/s 189 of the Act (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act);
- (n) Property Card, Ownership, records issued by government authority;
- (o) The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company;
- (p) Material agreements/ contracts, which, even if terminated, may have an impact on business;
- (q) Orders/judgement issued by Courts/statutory bodies and other background documents relevant for understanding such Orders; and
- (r) Register of Allotments.

Any other document, certificates, statutory registers that may be required to preserved permanently in terms the Act and/or the Listing Regulations.

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Annexure B

Documents with Preservation period of not less than eight years after completion of the relevant transactions

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, and deletions to the said documents shall also be preserved for a term not less than eight years.

- (a) Documents/Information furnished to Stock Exchanges including information submitted in compliance of Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished;
- (b) Books of Accounts including work papers and other documents related to the audit including Tax and Vat/GST Audit, Accounts Payable/Receivable ledgers, General Ledger, Annual Plans and Budgets;
- (c) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per the Act;
- (d) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India;
- (e) Notices in Form MBP-1 for disclosure of interest under section 184 of Act and Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014, received from directors of the Company;
- (f) Instrument creating a charge or modifying a charge, as per Rule 10(4) of the Companies (Registration of Charges) Rules, 2014;
- (g) Changes to the Memorandum and Articles of Association;
- (h) Employment record for the employees of the Company.
- (i) Office Copies of Notices, Register of Postal Ballot, Scrutinizer’s Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India;
- (j) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India;
- (k) Documents as are required to be maintained under relevant laws relating to direct and indirect taxes;
- (l) Marketing documents;
- (m) Press releases;
- (n) Legal documents including but not limited to contracts, legal opinions, orders passed by various courts and tribunals, documents relating to cases pending in any court, tribunal or authority;
- (o) Fixed Asset Register with supporting Purchase Orders and Bills for fixed assets addition;
- (p) Payroll TDS, PF return and challans applicable on payroll;
- (q) Register of Buy-back of Securities;
- (r) Business / Joint Venture / Sales Purchase Agreement / Loan / Lease Agreements; and

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(s) Trademark / Copy Rights.

Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Act and/or Listing Regulations.