



# **QUINT DIGITAL LIMITED**

*(FORMERLY KNOWN AS QUINT DIGITAL MEDIA LIMITED)*

**POLICY FOR PRESERVATION OF DOCUMENTS**

**AND**

**ARCHIVAL OF DOCUMENTS ON THE WEBSITE**

***PURSUANT TO REGULATION 9 READ WITH REGULATION 30(8) OF THE  
SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS  
AND DISCLOSURE REQUIREMENTS), REGULATIONS 2015***

**TABLE OF CONTENTS**

<b>S. NO.</b>	<b>PARTICULARS</b>	<b>PAGE NO.</b>
1.	INTRODUCTION	3
2.	PURPOSE	3
3.	SCOPE AND EXCLUSIONS	3
4.	CLASSIFICATION OF DOCUMENTS TO BE PRESERVED/ RETAINED	4
5.	RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS	4
6.	DESTRUCTION OF DOCUMENTS MENTIONED IN SUB CLAUSE (B) AND (C) OF CLAUSE 4 OF THIS POLICY	4-5
7.	SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS	5
8.	WEB ARCHIVAL POLICY	5
9.	REVIEW / AMENDMENT	5
10.	ANNEXURE	6-7
	DATES OF REVIEW/AMENDMENT	8

## 1. INTRODUCTION

The policy is framed to ensure systematic identification, categorization, maintenance, review, retain 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. PURPOSE

As per the provisions regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure) Requirements, 2015 (the “**Listing Regulations**”), every listed company shall have a policy on preservation of documents and archival. Further, as per regulation 30(8), every listed Company is required to disclose on its website all the events or information which in the opinion of the Board of Directors is material and which has been disclosed to stock exchanges, such disclosure shall remain hosted for a minimum period of 5 years and thereafter as per this Archival Policy.

This Archival Policy is for the purpose of identifying the retention period of events or information hosted on the Company’s website pursuant to the Regulations and under Securities Laws as defined under the Regulations.

## 3. SCOPE AND EXCLUSIONS

This policy covers disclosure of all events or information which has been made to the Stock Exchanges by the Company and hosted on its website as per the provisions of the Regulations and Securities Laws. This policy does not cover any events or information other than those specified under the Regulations and Securities Laws.

However, 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.

#### **4. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED/ RETAINED**

The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:

- a) Documents whose preservation shall be permanent in nature;
- b) Documents whose preservation period shall not be less than eight years after completion of the relevant transactions.
- c) Documents with preservation period other than those mentioned above: All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in A & B above shall be preserved accordingly.

As per the applicable provisions, the document may be preserved in physical and/ or electronic mode. The list of documents for the above categories is given in the **Annexure**.

#### **5. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS**

All the employees of the Company shall be responsible for ensuring proper preservation of the documents in their respective work responsibilities and are expected to discharge judiciously the responsibility of taking decisions to retain/preserve or destroy documents pertaining to their work responsibilities as per this policy.

#### **6. DESTRUCTION OF DOCUMENTS MENTIONED IN SUB CLAUSE (B) AND (C) OF CLAUSE 4 OF THIS POLICY**

Any of the documents mentioned in sub clause (B) and (C) of clause 4 of this policy, which are not required to be maintained and preserved permanently may be destroyed.

The documents/ records that have lived their life as per the policy may be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use. The documents / records referred in B and C part of the Annexure which are required to be preserved for at least eight years and three years respectively (or such additional period decided by the respective Department Heads of Company), may be disposed of after the expiry of the said period of their preservation, with the approval of the respective Department Heads of the Company.

## Policy for preservation of documents and archival of documents on the website

There shall be maintained a register of disposal of records (which is to be maintained permanently) wherein the brief particulars of the documents/ records disposed of shall be entered by the respective Department Heads of the Company either in physical or electronic form. The register of disposal of records shall contain the following columns:

Particulars of document alongwith provision of law	Date and mode of destruction	Initials of the authorized person initials of the authorized person

### 7. 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.

### 8. WEB ARCHIVAL POLICY

The specified events or information will be displayed on the website of the Company for a minimum period of five years or for such other period if the period prescribed is more than five years by the aforesaid Regulations and /or Securities Laws.

After completion of the minimum period of five years or such other period as prescribed by the Regulations and/or Securities Laws the events or information will be archived by the Company for a further period of three years. Thereafter such events or information may ceased to be displayed on the website of the Company.

### 9. REVIEW / AMENDMENT

This policy may be reviewed by the Board from time to time. However, any subsequent amendment/ modification in the Listing Regulations or the Companies Act, 2013 or any other governing Act/ Rules/ Regulations or re-enactment, impacting the provisions of the Policy shall automatically apply to the Policy and the relevant provision(s) of the Policy shall be deemed to be modified and/ or amended to that extent, even if not incorporated in the Policy.

**ANNEXURE**

**A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:**

1. Accounting and Finance records including Annual Financial statements and Audit Reports;
2. Investment records;
3. Tax records including annual returns;
4. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks;
5. Corporate Records including Certificate of Incorporation, Memorandum and Articles of Association, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other statutory registers and records;
6. Filings with Registrar of Companies;
7. A copy of Members Data including details of transactions in physical folios provided by RTA on quarterly basis;
8. Any other document, certificates, statutory register that may be required to be preserved permanently in terms of the provisions of the Companies Act, 2013 and/ or SEBI regulations or any other record as may be decided by any KMP (as per Companies Act 2013) or the Managing Director or the Board of Directors of the Company from time to time.

**B. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:**

1. Bank Statements and vouchers
2. Filings with Stock Exchanges and other statutory authorities
3. Disclosure of interest received from the Company in the manner prescribed under the Companies Act, 2013
4. Corporate Social Responsibility Records.
5. Instrument creating/ modifying/ satisfying charge
6. Personal files of individual employees (Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc)
7. Tender Documents.

**Policy for preservation of documents and archival of documents on the website**

8. Lease Deeds and Contracts.
9. Legal files
10. Insurance Records including policies and claims
11. All e-mail correspondence, internal & external
12. Dividend/ Interest/ Redemption Master data file containing details for each dividend/ interest/ redemption paid by the Company and reconciliation data of the Paid and Unpaid dividend/ interest/ redemption.
13. Reconciliation report on maintenance of stationery including blank certificates, dividend/ interest/ redemption warrants.
14. A List maintained by RTA of the folios for which enhanced due diligence is exercised.
15. A copy of report of the Internal Audit submitted by RTA.
16. A copy of Action Taken report, audit observations along with the corrective steps taken by the RTA.
17. Alteration in the Memorandum and Articles of Association of the Company
18. Any other record as may be decided by the Managing Director of the Company from time to time.

**C. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN THREE YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:**

1. Proof of sending Notice of Board Meetings and Committee meetings and its delivery.
2. Proof of sending Agenda and Notes on Agenda and their delivery.
3. Proof of sending and delivery of the draft of the Resolution(s) and the necessary papers.
4. Proof of sending draft Minutes of Board and Committee meetings and its delivery.
5. Proof of sending signed Minutes of Board and Committee meetings and its delivery.
6. Record of each recipient to whom the Notice of General Meeting(s) has been sent and copy of such record and any Notices of any failed transmissions and subsequent re-sending.

**Policy for preservation of documents and archival of documents on the website**

**DATES OF REVIEW/AMENDMENT**

<b>S.No.</b>	<b>Date of review/amendment</b>
1.	April 14, 2021
2.	May 30, 2022
3.	May 30, 2023
4.	May 30, 2024