

CLEAN MAX ENVIRO ENERGY SOLUTIONS PRIVATE LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

CHAPTER I: PRESERVATION OF DOCUMENT POLICY

1. PREFACE

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("SEBI Listing Regulations") imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

Regulation 9 states that:

"The listed entity shall have a Policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

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

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode."

Further, Regulation 51(3) of the Listing Regulations also states that all events or information, which have been disclosed to stock exchange(s) under Regulation 51, shall be hosted on the website of the Company for a minimum period of five years, and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per the applicable provisions of the Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

The Board of Directors of Clean Max Enviro Energy Solutions Private Limited ("Company") is required to formulate a policy for "Preservation of Documents" ("Policy") to comply with the requirements of Regulation 9 of the SEBI Listing Regulations.

Accordingly, this policy has been framed, keeping in view particularly the requirements of the Listing Regulations and the provisions of the Companies Act, 2013

2. DEFINITIONS

- (i) **"Act"** means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;
- (ii) **"SEBI Listing Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

- (iii) **"Company", "This Company", "The Company"** wherever occur in the policy shall mean "Clean Max Enviro Energy Solutions Private Limited".
- (iv) **"Board of Directors" or "Board"** shall mean the Board of Directors of the Company, as constituted from time to time.
- (v) **"Documents"** shall mean all papers, records, files, summons, notice, requisition, order, declaration, forms, 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.
- (vi) **"Policy" or "This Policy"** means, "Policy for Preservation of Documents and Archival Policy".
- (vii) **"Electronic Form"** with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.
- (viii) **"Website"** means website of the Company i.e. <https://www.cleanmax.com>

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A. The documents of a permanent nature (listed in **Annexure 1**) 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; provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.
- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure 2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time; provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.
 - (i) provided further that the Company shall keep the documents as specified above in an electronic mode.

3. AUTHORITY TO MAKE ALTERATION TO THE POLICY

Any director of the Company or the Company Secretary is authorized to make such alteration to this policy as considered appropriate, however, subject to the condition that such alteration shall be in accordance with applicable laws, including the provisions of the Companies Act, 2013, as amended (the "Companies Act") and the SEBI Listing Regulations.

4. 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. However, in the case of pending matters/litigation/disputes, the documents shall be preserved till the resolution of pending matter/litigation/dispute. The documents shall be destroyed after

taking the approval of respective Director/ Compliance Officer/ Department Head / Authorised Person.

The Company shall maintain a Register of Records and Documents Destroyed, containing the particulars of the documents destroyed, the year to which it pertains, mode of destruction etc., each entry in this register shall be verified by the Company Secretary and countersigned by the CFO.

5. 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 or any Director shall immediately inform all employees of the Company for suspension of further disposal of Documents.

6. MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

7. POLICY REVIEW

This Policy is framed based on the requirements of Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015. The Board of Directors may subject to applicable laws amend/substitute any provision(s) with a new provision(s) or replace this Policy entirely with a new policy.

If any subsequent changes in the Companies Act or the SEBI Listing Regulations are inconsistent with any part of this Policy, the provisions of the Companies Act or the SEBI Listing Regulations, as the case may be, shall prevail over the Policy and the provisions in the Policy shall be modified to make it consistent with such applicable law.

8. EFFECTIVE DATE

The policy, as approved by the Board of Directors, shall be effective from 1 April 2022.

CHAPTER II: ARCHIVAL POLICY

1. BACKGROUND

Regulation 51(3) of the SEBI Listing Regulations states that:

"The listed entity shall disclose on its website, all such events or information which have been disclosed to the stock exchange(s) under this regulation and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website."

In this context, the following policy has been framed by the Board of Directors of the Company.

2. OBJECTIVES

Pursuant to Regulation 51(3) 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.

3. SCOPE

In line with the Company's Policy on Determination of Materiality of Events and as per the SEBI Listing Regulations, the Company shall disclose all such events to the Stock Exchanges and such disclosures shall be hosted on the website of the Company (**www.cleanmax.com**) for a period of 5 years and thereafter the same shall be archived so as to be available for retrieval for a further period of three years by storing the same on suitable media. Thereafter the said information, documents, records may be destroyed as per the policy on preservation of documents.

4. POLICY REVIEW

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for noting at a meeting of the Board.

5. EFFECTIVE DATE

The policy, as approved by the Board of Directors, shall be effective from 1 April 2022.

ANNEXURE 1

Documents whose preservation shall be permanent in nature:

1. Incorporation / Registration Certificate and certificate of change of name, if any.
2. Memorandum and Articles of the Company.
3. Share Certificates, both original and duplicate.
4. Affidavit from the subscribers to the memorandum and from person named as the first directors.
5. Statutory Registers required under applicable laws.
6. Audited financial statements.
7. Minutes of Board / General / Committee Meetings.
8. Material Agreement/Contract.
9. Order issued by Courts / Tribunals / Statutory Bodies / Government Authorities.
10. Certificate for commencement of business, if any
11. Agreements made by the Company with the Stock Exchanges and Depositories ,etc.
12. Statutory forms except for routine compliance.
13. Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register.
14. Policies of the Company framed under the Companies Act, 2013 and various regulations from time to time.
15. Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.
16. Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

ANNEXURE 2

Documents with preservation period of not less than eight years after completion of relevant transaction:

1. Books of Accounts.
2. Annual Return(s).
3. Personnel Documents.
4. Insurance Policies/Claims under various laws.
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. Data stored in CDs, DVDs, etc.
11. Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings.
12. Employment /Personnel Record in case of employees of the Company.
13. Any other documents as may be required to maintain for a period not less than eight years in terms of applicable law(s), maintained and preserved from time to time.