

NAMAN INDUSTRIES PROXIMA LIMITED

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

*Pursuant to Regulation 30(8) and Regulation 46 of Securities and Exchange Board of India (Listing
Obligations and Disclosure Requirements) Regulations, 2015*

{As approved by the Board of Directors of the company in the board meeting held on August 22nd, 2025}

1. PREAMBLE:

The Board of Directors (the **"Board"**) of Naman Industries Proxima Limited (the **"Company"**) has framed this Archival Policy (the **"Policy"**) to provide guidelines for archival of records and documents. This policy is framed as per Regulation 30(8) and Regulation 46 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**"SEBI Listing Regulations"**) which require all listed companies to host on their website various disclosures required under the SEBI Listing Regulations for a minimum period of five (5) years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

The said policy was approved by the Board of Directors in their meeting held on 22nd August, 2025 and shall be effective from 22nd August, 2025.

2. SCOPE AND OBJECTIVES OF THE POLICY:

This Policy is applicable to all departments of the Company. It not only covers the various aspects on preservation of the documents, but also the safe disposal/destruction of the Documents.

The objective of this Policy is to outline the manner in which documents, disclosures, and information hosted on the Company's website for the mandatory period of five (5) years shall be preserved and archived thereafter. It provides a clear framework for identifying the information to be disclosed, ensuring timely and consistent disclosure, and defining the process for archiving or removing such content once the required initial disclosure period has lapsed. The Policy also specifies which documents are to remain permanently on the website and which are to be archived or deleted based on regulatory requirements.

3. DEFINITIONS:

3.1 **"Applicable Law"** means the Companies Act, 2013 and the rules made thereunder, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any further amendments therein which includes any other statute, law, standards, regulations or other governmental instruction relating to Related Party Transactions.

3.2 **"Documents"** means all papers, records, files, books etc. and the like as required to be maintained under any law or regulation for the time being in force.

3.3 **"Electronic Record(s)"** means the electronic record as defined under clause (t) of sub section (1) of section 2 of the Information Technology Act, 2000.

3.4 **"Electronic Form"** means 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.

3.5 **"Maintenance"** means keeping Documents, either physically or in Electronic Form.

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

4. CLASSIFICATION:

"Annexure A" provides an indicative list of documents along with the corresponding timelines for their maintenance, preservation, and disposal.

The Chief Financial Officer (CFO) or the Company Secretary of the Company is authorized to review and modify the Document Preservation Schedule from time to time, as deemed necessary, to ensure continued compliance with applicable laws and regulations. They shall also be responsible for overseeing and monitoring adherence to this Policy.

5. MODES OF MAINTENANCE:

Documents may be preserved either in **physical** or **electronic form**, as appropriate. The responsibility for preserving such documents shall lie with the designated Authorized Person of the Company.

Preservation practices must ensure the integrity, authenticity, and accessibility of the documents, and must safeguard against any tampering, alteration, destruction, or other actions that may compromise their reliability or utility.

All preserved documents shall remain accessible at all reasonable times for reference or regulatory purposes.

6. DISPOSAL OR DESTRUCTION OF DOCUMENTS:

All documents listed in **Annexure A** to this Policy that are designated for temporary preservation may be destroyed upon the completion of their prescribed retention period. This applies to both physical and electronic records. A **Register of Disposed/Destroyed Documents** shall be maintained in the format provided in **Annexure B**, and each entry in the register must be duly authenticated by the designated authorized person of the Company.

7. AMENDEMENTS

The Board may, subject to applicable laws or regulations, amend or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with applicable provisions of any law or regulation for the time being in force.

8. DISSEMINATION OF THE POLICY :

The policy shall be hosted on the website of the Company i.e. <https://nipl.co/investor>

Annexure A
Indicative List of Documents for Preservation
As per the Policy on Archival and Preservation of Documents

This Annexure provides an indicative list of documents categorized based on their required duration of preservation, in accordance with regulatory requirements and best corporate governance practices. The documents are classified as either Temporary Preservation or Permanent Preservation items, and are applicable to both physical and electronic formats.

1. Corporate Secretarial Records

Documents for Temporary Preservation	Retention Period including period of hosting on website, if any	Documents for Permanent Preservation
Annual Returns	8 years from date of filing with MCA	Certificate of Incorporation
Director disclosures of interest	8 years from end of relevant financial year	Certificate of Change of Name
Notice, Agenda, and related papers for Board/Committee Meetings	8 years	Certificate of Commencement of Business
Register of Directors' Attendance	8 years	Memorandum & Articles of Association (as amended)
Register of Sitting Fees paid to Directors	8 years	Minute Books of Board and Committee Meetings
Register of Proxies	8 years	Minute Books of General Meetings
Register of Inspection	8 years	Register of Members
Postal Ballot Register, Scrutinizer's Report, and Office Copies of Notices	Until resolution is implemented or 10 years, whichever is later	Index of Members
Register of Allotments	8 years	Register of Charges
Register of Deposits	Not less than 8 years from last entry	Register of Transfer & Transmission of Shares
Instrument creating/modifying charge	8 years from satisfaction of charge	Register of Loans, Guarantees, Securities, and Acquisitions
Register of Debenture or Security Holders	8 years from date of redemption	Register of Investments held in Company's name

Foreign Register of Debenture/Security Holders	8 years from date of redemption	Register of Investments not held in Company's name
Share certificate issuance documents (including blank forms)	Not less than 30 years; preserve permanently in disputed cases	Register of Contracts in which Directors are Interested
ROC/Stock Exchange filings (physical & electronic)	8 years	Register of Renewed and Duplicate Share Certificates
		Register of Directors, Managing Director, Manager, and Secretary
		Register of Directors' Shareholding
		Register of Inter-Corporate Loans and Investments
		Registers under SEBI (SAST) Regulations, 2011
		Registers under SEBI (PIT) Regulations, 2015
		Annual Reports

2. Accounts, Finance and taxation related Documents

Documents for Temporary Preservation	Retention Period including period of hosting on website, if any	Documents for Permanent Preservation
Books of Accounts including work papers and other documents related to the audit including Tax and Vat Audit, Accounts Payable/Receivable ledgers, General Ledger, Annual Plans and Budgets	8 years	Investment Records
Payroll TDS, PF, ESI return and challan applicable on payroll	8 years	Fixed Asset Register with supporting Purchase Orders and Bills for fixed assets addition
Excise Duty /Service tax/VAT records/returns	8 years	

Bank Statement	8 years	
Employee Expense Records	8 years	

3. Insurance Records

Documents for Temporary Preservation	Retention Period including period of hosting on website, if any
Claim Files	8 years from settlement of claim
Insurance Policies for the Company	8 years

4. Contracts entered into by the Company including Marketing Records

Documents for Temporary Preservation	Retention Period including period of hosting on website, if any
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents)	8 years

5. Legal Files and Records

Documents for Temporary Preservation	Retention Period including period of hosting on website, if any	Documents for Permanent Preservation
Litigation files	8 years after expiration or disposal of the case	License and Permits, and other statutory approvals - Permanent or till the date of validity
		Trade Mark and related correspondence
		Court Orders

6. Property Records

Documents for Permanent Preservation
Original Purchase/ Sales Deeds,
Property Cards Ownership records issued by Government Authority

7. Personnel and HR Records including Payrolls Records

Documents for Temporary Preservation	Retention Period including period of hosting on website, if any	Documents for Permanent Preservation
Correspondence with Employment Agencies and Advertisements for job openings	1 year after job opening is closed	Personnel Files of individual employees
Leave Records	1 year after termination of employment	
ESI/PF/LWF/Profession contribution & Returns	Tax 8 years	

8. Miscellaneous Records

Documents for Temporary Preservation	Retention Period including period of hosting on website, if any	Documents for Permanent Preservation
Consultant Reports	8 years	Registration under various Statutes
Policy and procedures manuals	Current version with revision history	
Electronic mails	05 years as specified under Listing Regulations. Can be archived for a period of 03 years after initial period of 05 years of live page	
Web page files		

Any other document(s) as may be required to maintain in terms of applicable law(s) or regulation(s) for the time being in force, maintained and preserved from time to time.

Annexure B

Format of the register of Documents disposed/destroyed
As per the Policy on Archival and Preservation of Documents

Sl. No.	Particulars of documents disposed/destroyed	Date and Mode of disposal/destruction	Initials of the Authorised Person

For Naman Industries Proxima Limited

[Signature]

Director