



BIOTIC WASTE LIMITED

**(FORMERLY KNOWN AS BIOTIC WASTE PRIVATE LIMITED &
VULCAN WASTE MANAGEMENT PRIVATE LIMITED)**

Preservation of Documents & Archival Policy

Under Regulation 9 and 30(8)

Pursuant to SEBI (*Listing Obligations and Disclosure Requirements*)

Regulations, 2015 (Listing Regulations)

Policy for Preservation of Documents

Registered Office: 725, Pace City-2, Sector 37, Gurgaon-122004, Haryana

1. LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“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.

The Board of Directors of BIOTIC WASTE LIMITED (Formerly Known as Biotic waste Private Limited and Vulcan Waste Management Private Limited) (“the Company”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

2. DEFINITIONS

A. “Board of Director” or “Board”, means the collective body of the Directors of the Company;

B. “Company”, “This Company”, “The Company” wherever occur in the policy shall mean “BIOTIC WASTE LIMITED (Formerly Known as Biotic waste Private Limited and Vulcan Waste Management Private Limited)”

C. “Documents” Documents shall mean all papers, records, files, 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.

D. “Listing Regulations” Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

3. OBJECTIVE

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. Provided further that the Company may keep the documents as specified above in an electronic mode.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

5. GENERAL

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

6. MODES OF PRESERVATION

The Documents may be preserved in:

- (a) Physical Mode; or
- (b) Electronic Mode.

The official of the Company required to preserve the document shall be Authorized Person who is generally expected to observe the compliance of statutory requirements as per applicable law. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents. The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

8. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) 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 the applicable provisions of any law for the time being in force.

INDICATIVE LIST OF DOCUMENTS:-

A) PERMANENT PRESERVATION:

- a. Certificate of Incorporation
- b. Certificate of Commencement of Business
- c. Memorandum and Articles of Association of the Company
- d. Minutes Books of Board Meetings, General Meetings and Committee Meetings
- e. Statutory Registers
- f. License and Permissions

- g. Statutory Forms and disclosures except for routine compliance

- h. Scrutinizers' Reports
- i. Register & Index of Member
- j. Common Seal

B) TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- f. All notices pertaining to disclosure of interest of directors
- g. Instrument creating a charge or modification
- h. Books of accounts, financial statements etc.
- i. Register of debenture holders or any other security holders

C) OTHERS: As per applicable law