

**AFFLE (INDIA) LIMITED**  
**POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF THE DOCUMENTS**

**1. BACKGROUND**

Affle (India) Limited (hereinafter referred to as the “Company”) presents policy statement for preservation and archival of its documents in accordance with the Regulation 9 and Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

**2. OBJECTIVE OF POLICY**

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in ordinary 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.

**3. LAW**

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires the Company to formulate policy for preservation of documents classifying the documents to a minimum of 2 categories including preserving those documents in electronic mode.

Regulation 30 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 provides that every company shall disclose on its website all such events or information which has been filed with stock exchange under the same regulation for a minimum period of 5 years and archival policy shall prescribe disclosure of such events or information thereafter.

**4. DEFINITIONS**

The definitions of some of the key terms used in this policy are given below:

- a) “**Policy**” means this Policy on preservation and archival of documents
- b) “**Company**” means Affle (India) Limited.
- c) **Words and expressions** used and not defined herein but defined in Companies Act 2013, Securities Contracts (Regulation) Act 1956, SEBI Act 1992, and Rules/Regulations framed therein, and the listing agreement/s shall have the meaning respectively assigned to them in those provisions.

**5. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED**

For preservation, the Company’s physical and electronic documents shall be classified 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 whose preservation period shall not be less than 7 years after disclosure

The documents as specified in a), b) and c) above may be kept in electronic mode also. The list of documents for the above categories is given in the **Annexure**.

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

All the Employees on permanent roles of the Company are responsible for taking into account the potential impact on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

#### **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. STATUTORY REQUIREMENTS**

If as per any other laws of land, 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 for the longest term as per the applicable statutory stipulations.

#### **9. WEB ARCHIVAL**

- a) The Company shall disclose on its website all events or information which has been disclosed to Stock Exchange(s) and retain the same for period of five years.
- b) At the end of five years, the information shall be archived and preserved for a further period of three years.

#### **10. AMENDMENTS**

The Company may modify this Policy at any time with approval of the Board and in compliance of applicable laws.

## ANNEXURE

### **a) Documents Whose Preservation Shall Be Permanent in Nature**

- Accounting and Finance records including Annual Financial statements and Audit Reports;
- Investment records;
- Tax records including annual returns;
- Property records including purchase and sale deeds, licences, copyrights, patents & trademarks;
- Corporate Records including Certificate of Incorporation, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records;
- Personal files of individual employees (Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc);
- Filings with Registrar of Companies.
- Any other record as may be decided by 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**

- Bank Statements and vouchers;
- Filings with Stock Exchanges and other statutory authorities;
- Corporate Social Responsibility Records;
- Sponsorship Projects Records;
- Correspondence and Internal Memoranda;
- Security Deposit Receipts (after receipt of deposit money back);
- Tender Documents;
- Lease Deeds and Contracts;
- Legal files;
- Insurance Records including policies and claims;
- All e-mail correspondence, internal & external;
- Any other record as may be decided by the Board of the Company from time to time.

### **c) Documents whose preservation period shall not be less than 7 years after disclosure**

- All Protected Disclosures in writing or documented along with the results of investigation relating under Whistle Blower Policy