



Olympia Industries Ltd.

**POLICY FOR PRESERVATION & ARCHIVAL
OF DOCUMENTS & RECORDS**

Policy for preservation & archival of documents & records

1. Preamble

This Policy for preservation & archival of documents & records ("Policy") is prepared and adopted to effectively manage the records of Olympia Industries Limited ("the Company") and is obliged to create, maintain, preserve and dispose of such records in accordance with the requirement of Regulation 9 and Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the relevant provisions of the Companies Act, 2013 and rules made thereunder; as amended from time to time.

The Board of Directors ("the Board") of Olympia Industries Limited ("the Company") has adopted the following policy and the Board may amend this policy from time to time.

2. Purpose & Scope:

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of document is required. A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents. This policy seeks to ensure that the Company's business is adequately documented which are managed in accordance with best practice.

3. Definitions:

"Act" means Companies Act, 2013

"Board of Directors" or "the Board" means the Board of Directors of Olympia Industries Limited, as constituted from time to time.

"Company" means Olympia Industries limited.

"Document" as per section 2(36) of the Companies Act, 2013, includes all summons, notices, requisitions, orders, declarations, forms and registers, etc., including statutory, legal and other documents, whether issued, sent or kept in pursuance of the Act or any other law for the time being in force or otherwise, maintained on paper or in electronic form.

"Electronic Form" means on any 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.

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

“**Maintain**” means keeping documents, either physically or in electronic form.

“**Policy**” means this Archival Policy.

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

“**Records**” documentary or electronic evidence of past events or transactions.

Any other term not defined herein shall have the same meaning as prescribed under the Companies Act, 2013, Listing Regulations or any other relevant regulation/legislation applicable to the Company.

1. Preservation & Archival of Documents

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

Annexure I of this policy contain the details of Documents whose preservation shall be permanent in nature, subject to the modifications, amendments, additions or deletions or any changes made therein from time to time. Provided that the Company may also preserve all such modifications, amendments, additions or deletions in the Documents permanently.

Annexure II of this policy contains the details of documents whose preservation shall be temporary in nature and shall be maintained in the following manner:

- All such documents having preservation period of 8 (eight) years as per applicable laws, shall be preserved for such period as prescribed under the applicable laws but not less than 8 (eight) years.
- All other documents for which the period of preservation is not prescribed under any laws shall be preserved for a minimum period of 8 (eight) years or any such specific period as the Company deems necessary.

The documents not covered under this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation, for the time being in force.

2. Mode of Preservation

The Company shall maintain these documents either in physical or in electronic form. The applicable provisions of law, rules and regulations with regard to electronic form of maintenance of documents shall be adhered to. All the documents shall be maintained as per the prescribed formats, if any, as

amended from time-to-time under the various rules and regulations.

The Company may preserve the documents in following manner:

- a) Documents in electronic form can be maintained in forms such as e-mails, web pages or database records, plus scanned versions of papers that have been digitized in business processes or any other mode as may be prescribed by the Board from time to time.
- b) Physical documents to be maintained in books and files or any other mode as may be prescribed by the Board from time to time.

All digital and physical documents shall be saved/ maintained at the registered office of the Company or such other place in compliance with section 128 of the Act.

3. Web Archival Policy

The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s).

The disclosures made pursuant to Regulation 30 of Listing Regulations shall be retained on the website of the Company for a minimum period of five years. Thereafter depending upon the nature, materiality, impact and relevance of the material event, the disclosure of such material event can continue to remain hosted on the Company's website for a period of 3 (three) years or such longer period as may be decided by the Board from time to time.

4. Disposal and Destruction of Documents

All documents mentioned in Annexure-1 need to be permanently preserved by the Company during its entire life time. Utmost care shall be taken to ensure that documents are well preserved.

All documents mentioned in Annexure-2 which are temporary in nature must be preserved for a period of not less than 8 years.

After the expiry of the statutory retention period, the preserved documents may be destroyed. The documents may be destroyed as follows:

- a) Recycle non-confidential paper records;
- b) Shred or otherwise render unreadable confidential paper records; or
- c) Delete or destroy electronically stored data.

5. Review

The policy has been approved by the Board of Directors of the Company. The Board, however, may review this policy as and when it deems appropriate. This policy is being formulated keeping in mind the applicable laws, rules, regulations and standards in India. If there is an amendment in such laws, rules, regulations and standards, allowing standards, then this Policy shall be deemed to have been amended to the extent of such amendment. Also, if due to subsequent amendment in the laws, this Policy or any part hereof becomes inconsistent with the law, the provisions of law shall prevail and this

Policy shall be deemed to be amended to that extent.

6. Officer responsible:

Any one of the Whole-time Director, CFO or the Company Secretary & Compliance Officer of the Company shall be responsible for ensuring overall compliance of this Policy.

Annexure I:

1. Registration Certificates obtained from various statutory authorities.
2. Incorporation documents.
3. Licenses & Statutory Approvals.
4. Statutory Registers required under applicable laws.
5. Share Certificate forms and related books and documents in case of disputed cases.
6. Minutes of General Meetings, Board meetings and various Committee Meetings.
7. Memorandum and Articles of Association as amended from time to time.
8. Material Agreements/Contracts
9. Orders issued by Courts/Statutory bodies.
10. Investment Documents/proofs including certificates etc.
11. Documents relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
12. Documents related to Development/Intellectual Property and Trade Secrets.
13. Policies of the Company framed under various regulations.
14. Any other document as may be required to maintain permanently under various law(s) applicable to the Company.

Annexure II

1. Books of Accounts, Balance Sheet and Profit & Loss Statement, together with the vouchers relevant to any entry in such books of account.
2. Copies of all Annual Return(s) and certificates and documents annexed thereto.
3. Attendance Register of Meetings of the Board and Committees & General Meetings.
4. All notices pertaining to disclosure of interest of directors.
5. Notice, Agenda, and other documents related to Board & Committee Meeting.
6. Notice, Scrutinizers report and other documents related to General Meeting.
7. Instrument creating a charge or modification.
8. Any other documents as may be required to be maintained under various laws applicable to the Company for the period stipulated.