

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

1. Introduction

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") mandates every Listed Company to formulate a Policy on Preservation & Archival of Documents ("Policy") which has to be approved by the Board of Directors.

In this context, the Board of Directors ("Board") of the Kairosoft AI Solutions Limited (formerly known as Pankaj Piyush Trade & Investment Limited) ("the Company") has adopted the said Policy with the objective of classifying various documents, records and registers for the purpose of maintenance, preservation and archiving.

This Policy has been formulated in accordance with the Regulation 9 read with Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The Board has the power to modify and amend the said Policy.

2. Objective of the Policy

The objective of this Policy is to ensure that all the necessary data, information, documents and records of the Company, whether paper based or electronic based, are adequately protected and preserved as per the statutory requirements and as defined here under. This Policy facilitates the employees in handling the documents efficiently either in physical form or in electronic form. It also covers the various aspects on preservation of the documents, their archival and safe disposal/destruction.

Further, the Policy aims to disseminate equal, adequate and timely information to the shareholders through the website of the Company and to enable them to track the performance of the Company at regular intervals.

This Policy aims to classify the Documents, records and registers of the Company either in physical form or electronic form as given herein:

- (i) to be preserved permanently and
- (ii) III. to be preserved for a specific period of time

3. Definition

i. **“Company”** means the Kairosoft AI Solutions Limited (formerly known as Pankaj Piyush Trade & Investment Limited).

ii. **“Board”** means the board of directors of the Company or its Committee;

iii. **“Documents”** means as defined in sub-section 36 of Section 2 of the Companies Act, 2013.

iv. **“Electronic Records”** means as defined in Information Technology Act, 2000 or as amended from time.

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

vi. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed vi. **“Policy”** means this Policy of Preservation of Documents of the Company;

vii. **“Records”** in relation to this policy includes accounting records, books or papers and books and papers as defined in sub-section 12 of section 2, books of accounts as defined in sub-section 13 of section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not.

viii. **“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.

ix. **“Maintenance”** means keeping Documents, either physically or in Electronic Form.

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

xi. **“Authorised Person”** means the functional head of the concerned department or any other person duly authorised by the Board or the Managing Director or the Whole Time Director of the Company.

4. Classification for Preservation of Documents:

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to-time. While this Policy lays down the minimum period for preservation of documents, the retention of documents as identified specifically in the Policy and documents not identified herein should be determined by the relevant Head of the Department by applying general guidelines and other important factors.

The preservation of Documents shall be done in the following manner:

Category A Documents: Documents which are to be preserved permanently, either under Applicable Law. An indicative list of documents are as follows:

1. Registration Certificates
- 2 Licenses & Statutory Approvals
- 3 Statutory Registers required under applicable laws
- 4 Audited financial statements
- 5 Minutes of General Meeting
- 6 Minutes of Board Meeting
- 7 Minutes of various Committee Meetings
- 8 Material Agreements/Contracts
- 9 Orders issued by Courts/Statutory bodies
- 10 Investment Documents/proofs including certificates etc.
- 11 Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Category B Documents: Document which are required to be preserved for not less than eight years after the completion of the relevant transactions. An indicative list of documents are as follows:

- 1 Books of Account together with relevant vouchers (Not less than 8 financial year)
- 2 Instrument Creating a Charge or modification thereon (8 years from the date of satisfaction of charge)
- 3 Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities) (MGT-2)
- 4 Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)
- 5 All notices pertaining to disclosure of interest of directors (MBP-1) for a period of 8 years from the end of the financial year to which it relates
- 6 All notices pertaining to disclosure of interest of directors (MBP-1) for a period of 8 years from the end of the financial year to which it relates

- 7 All certificates surrendered to a company (3 years from date of surrender)
- 8 Register of deposits (not less than 8 years from the date of last entry)
- 9 The postal ballot and all other papers relating to postal ballot including voting by electronic means, (as long as they remain current or for 8 financial years), whichever is later
- 10 All books and documents relating to the issue of share certificates, including the blank forms of share certificates not less than 30 years
- 11 Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode (8 Financial years) (SS-1)
- 12 Copies of Notices, Agenda, Notes on Agenda and papers related to Board Meeting. (8 Financial Years) (SS-1)
- 13 Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2)
- 14 Personnel Documents
- 15 Insurance Policies under various Policies
- 16 Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

5. Mode of Maintenance:

The Company shall maintain these records either in physical or in Electronic Form. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to. All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

6. Disposal and Destruction of Records:

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents. 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.

7. Custody:

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person, Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Disc, other storage devices or such other Documents and devices in his possession and such authorised person taking possession of documents needs to change the password.

8. Register of the Documents disposed/destroyed:

A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the Authorised Person. The register shall contain the following mandatory information Particulars of Document, Date of Destruction, Mode of Destruction, Initials of the Authorised Person and any other information as the Company may deems fit under the head Remarks of the Register.

Archival Process:

- i. All the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations will be hosted on the website of the Company under the section entitled "Investor Relations" for a period of five years and thereafter it will be shifted to the section entitled "Archives" hosted on the website of the Company.
- ii. The disclosures of information and events communicated to the stock exchanges will be retained on the website of the Company in the section entitled "Archives" for a minimum period of two years. Such disclosures which have been shifted to the section entitled "Archives" hosted on the website of the Company may be archived from the website of the Company after completion of the two years, commencing after completion of the five year period as prescribed under the Listing Regulations.
- iii. This policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.

Communication of this Policy

This Policy shall be posted on the website of the Company at www.Kairosoft.ai
