



ROSSELL TECHSYS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

(Effective from September 25, 2024)

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1. Introduction:

The Corporate records of Rossell Techsys Limited (“the Company”) are an important asset of the Company. It is the responsibility of every employee of the Company to keep and maintain complete, accurate and high-quality records in such a manner that the same is retrievable when needed and maintained in good condition and preserved till such time as required under the various applicable laws.

Regulation 9 of the Securities and Exchange Board of India (SEBI), (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended [“Listing Regulations”] mandates listed Company to formulate a policy for “Preservation of Documents”.

Further, Regulation 30(8) of Listing Regulations refers to an Archival Policy pursuant to which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Accordingly, the Board of directors of Rossell Techsys Limited has approved and adopted the policy for the preservation of documents and archival policy.

2. Definitions:

“Board of Directors” or “Board” means the Board of Directors of Rossell Techsys Limited, as constituted from time to time as per the relevant laws and rules and regulations.

“Company” means Rossell Techsys Limited.

“Documents” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained, whether maintained in physical or electronic mode under any law or regulation for the time being in force.

“Policy” means policy for preservation of documents and archival policy of the Company.

Unless the context otherwise requires, words and expressions used in this Policy and not defined herein but defined in the Act and SEBI Listing Regulations as may be amended from time to time shall have the meaning respectively assigned to them therein.

3. Purpose and Objective:

The objectives and purpose of this Policy is to classify the documents in below two categories:

- a. documents which need to be preserved permanently and
- b. documents which need to be preserved for a period not less than eight (8) years after completion of the relevant transactions.

This policy establishes retention and is framed for the purpose of systematic identification, categorization, maintenance, retention, and destruction of documents received or created in the normal course of business.

4. Responsibility:

Responsibility to maintain the documents in a safe manner and decision to destroy the documents after the retention period lies with the respective Department Head.

5. Maintenance of Records:

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.

6. Archival:

- a. The documents and records which are no longer current, but which are required to be preserved for a specified period of time or permanently under the applicable laws/ rules/ regulations shall be archived by the Company.
- b. Every Function/Unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy. Every Function/Unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- c. The documents and records may be archived in physical and/or electronic mode and shall be stored in the premises of the Company or with an approved warehousing agency in case of physical documents and on the server of the Company and/ or the server of any third-party vendor/ service provider in case of electronic documents having appropriate security and safety measures.
- d. The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.
- e. The Company shall preserve all documents as indicated in the Policy:
 - i. In the event of any conflict between the provisions of this policy and any applicable statutory/regulatory requirements (e.g., Companies Act, SEBI Regulations, regulatory guidelines, etc.), the latter shall prevail.
 - ii. The Company respects personal data. Statutes/regulations define the maintenance/ period of retention of personal data which is legitimately collected by the Company. Accordingly, notwithstanding the requirements of this policy, personal data shall be retained in accordance with the requirements of applicable statutes/ regulations.

7. Destruction of Records:

The records/ documents preserved shall be reviewed every year or according to the need of the respective departments and actions taken to destroy those records which are due for disposal.

Concerns or any non-compliance noted regarding this policy should be addressed to investors@rosselltechsys.com.

8. Suspension of Records Disposal in the Event of Litigation/Claims:

In the event the Company is served with any notice for documents from any statutory authority or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of notice/litigation, etc. shall be suspended until such time the matter is settled or resolved or disposed off or as ordered by the respective authority. The Administrator shall immediately inform all employees of the Company for the suspension of further disposal of Documents.

9. Hosting of information on the website of the Company:

This Policy, all amendments thereto and disclosures made by or on behalf of the Company of events or information to the Stock Exchange(s) under or pursuant to the Regulations or this Policy, shall be hosted on the Company's website for a minimum period of five years in accordance with the Regulations.

10. Review and amendments:

Any subsequent amendment/modification in the Act or the Rules framed thereunder or the SEBI Listing Regulations and/or any other laws in this regard the statutes would prevail over the Policy and shall automatically apply to this Policy. The Board of Directors reserves its right to amend or modify the policy in whole or in part, at any time without assigning any reason whatsoever.

Note: This policy has been approved by the Board of Directors of the Company at its meeting held on September 25, 2024 and shall be effective from September 25, 2024.
