

GACM TECHNOLOGIES LIMITED

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***Policy for Preservation of
Documents***

REGISTERED OFFICE: KURA Towers, 10th Floor, D. No. 1-11-254 & 1-11-255 S.P. Road, Begumpet, Hyderabad-500016, Telangana, India.

CIN: L67120TG1995PLC020170

WEBSITE: <https://www.gacmtech.com/> **EMAIL ID:** cs@gacmtech.com

CONTACT: 040-69086900/84

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1. INTRODUCTION:

Pursuant to Regulation 9, Regulation 30 and other applicable regulations of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), every listed company is required to formulate a policy on preservation and archival of documents ("Policy") which must be approved by its Board of Directors ("Board").

The Companies Act, 2013 ("Act") and the rules made thereunder contains provisions for maintenance of various documents including documents, registers, and records by the Companies; the place at which such documents are to be maintained and the period for preserving such documents.

In this context, the Board of GACM Technologies Limited ("Company" or "GACM") has adopted this Policy with the objective of categorizing various documents, records and registers for the purpose of maintenance, preservation and archiving. This Policy is effective from the date of listing of the equity shares of the Company on the stock exchange(s).

2. OBJECTIVE AND APPLICABILITY OF THE POLICY:

Regulation 30(8) of the Listing Regulations requires the Company to disclose on its website all events or information communicated to the stock exchanges under the Listing Regulations, for a minimum period of five years and thereafter as per the archival policy of the Company.

In compliance with this requirement and Regulation 46 of the Listing Regulations, the Company has adopted this Policy to govern the archival of disclosures made on its website pertaining to events and information communicated to the stock exchanges under Regulation 30 of the Listing Regulations.

This Policy is also applicable to the information and documents which has been disclosed to the stock exchanges and published on the website of the Company.

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3. DEFINITIONS:

- “Document(s)” refers to any papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, that are required under or in order to comply with the requirements of any applicable law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force, or otherwise, maintained on paper or in Electronic form and does not include multiple or identical copies.
- “Electronic Record(s)” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- “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.
- “Maintenance” means keeping Documents, either physically or in Electronic Form.
- “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

4. DOCUMENTS TO BE ARCHIVED:

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 in the Company’s records and
- (ii) To be preserved for a specific period of time.

(i) Documents which are to be preserved permanently in the Company’s records:

The Company shall maintain the following documents on a permanent basis:

- a. Incorporation Documents
- b. The original signed and stamped Memorandum of Association and the Articles of

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Association of the Company

- c. Minutes of General Meetings, Board Meetings and various Committee Meetings
- d. Register of Members along with Index
- e. Foreign Register of Members, if any
- f. Register of loans, guarantee, security and acquisition made by the Company
- g. Register of investments not held in its own name by the Company, if any
- h. Register of contracts with related party and contracts and Bodies etc. in which directors are interested
- i. Register of Charges
- j. Registers of Renewed and duplicate share certificates
- k. Register of Directors and Key Managerial Personnel
- l. Merger Order(s) issued by Hon'ble High Court/National Company Law Tribunal.
- m. Approval(s) and Product Registration & license(s) received from Statutory Authorities, Central & State Government(s)
- n. Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.
- o. Preservation and safe custody of all books and documents relating to the issue of share certificates, including the blank forms of share certificates for a period of 30 years, and in case of disputed cases, permanently.

(ii) To be preserved for a specific period of time:

A. Documents which are to be maintained on website of the Company for a minimum period of five (5) years:

- a. Disclosure of all events and information provided to the Stock Exchanges as per the Listing Regulations.
- b. Investor Presentation and audio video recordings/ transcripts of earnings / quarterly calls conducted physically or through electronic means.
- c. Press Releases

B. Documents which are to be maintained for at least eight financial years:

- a. Books of account together with the vouchers relevant to any entry in such books of account.

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- b. Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company.
- c. Copies of all Annual Returns
- d. E-forms filed with the Registrar of Companies
- e. Disclosure of Interest received from the Directors of the Company in the manner prescribed
- f. Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
- g. Instrument creating a Charge or modifying a Charge, if any
- h. Changes to the Memorandum of Association and the Articles of Association, if any
- i. Register of deposits accepted or renewed, if any
- j. Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for appeal, as the case may be
- k. Employment /Personnel Record should be retained for a period of eight (8) years following cessation of employment in case of employees of the Company
- l. Relevant marketing and sales documents
- m. Legal documents including but not limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters

Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department in writing.

5. ARCHIVAL POLICY

In accordance with the provisions of the aforesaid Listing Regulations, the Company shall ensure that all the relevant information shall be hosted on the Company's website as specified under clause 4 (ii) above, for a period of five years. Subsequently, such disclosures shall be removed

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from the Company's website. Thereafter the same shall be archived so as to be available for retrieval for a further period of three years by storing the same on suitable media. Thereafter the said information, documents, records may be destroyed as per the policy on preservation of the documents. After the Preservation Period, such archives would be deleted or removed after obtaining approval of the Chief Financial Officer or Company Secretary.

Sr. No.	Particulars	Details
1.	Approved by	Board of Directors
2.	Last Amended & Effective Date	12-11-2025
3.	Authorized Person	Mr. Jonna Venkata Tirupati Rao

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SPECIMEN FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED-OFF / DESTROYED

Particulars of document along with provision of law	Date and mode of destruction	Initials of the authorised person

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