

WAKEFIT INNOVATIONS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

Document version	Approved By	Date of approval	Date of Amendment
1.0	Board of Directors	November 27, 2025	-



1. Introduction

The Corporate records of Wakefit Innovations Limited (*formerly known as Wakefit Innovations Private Limited*) (“the Company”) are important assets of the Company. It is the duty of every employee to keep the records in such a manner that the same is retrievable when needed and maintained in good condition and preserved till such time as mentioned below.

It is the Company’s policy to maintain complete, accurate and high-quality records as per the Companies Act, 2013 (“Act”) rules made thereunder and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended (“SEBI Listing Regulations”) and all other applicable laws (hereinafter referred to as “**Relevant laws**”).

The Board of Directors of the Company is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of SEBI Listing Regulations. Further, Regulation 30(8) of SEBI Listing Regulations requires every listed entity to make available an archival policy on its website. Accordingly, a policy for the preservation of documents and archival policy has been formulated.

2. Definitions

- 2.1 “**Authorized Person**” means the officer(s) of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents.
- 2.2 “**Board of Directors**” or “**Board**” means the Board of Directors of Wakefit Innovations Limited, as constituted from time to time as per the relevant laws and rules and regulations.
- 2.3 “**Company**” means Wakefit Innovations Limited.
- 2.4 “**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.
- 2.5 “**Policy**” means this Policy on preservation of documents and Archival documents formulated by the Company.
- 2.6 “**SEBI Listing Regulations**” means the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, as amended from time to time.

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 whose preservation shall be permanent in nature and
- b. documents with preservation period of not less than eight years after completion of the relevant transactions

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode. This policy establishes retention and archival schedules for various data categories defined in this policy and this policy 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. **Officers responsible for preservation of documents**

The respective Functional/ Departmental heads of the Company shall be responsible for identification, maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

5. **Provision regarding Preservation of Documents**

For the purpose of the Policy, the Documents of the Company are classified as follows:

- 5.1 The list of Documents which shall be permanently preserved is given in **Annexure A** to this Policy. The Company shall permanently preserve these Documents subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the Documents shall also be preserved permanently by the Company.
- 5.2 The list of Documents which shall be preserved for a period not less than 8 years after completion of the relevant transaction is given in **Annexure B** to this Policy. The said Documents shall be preserved subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the Documents shall also be preserved for the said period.

6. **Modes of preservation**

The Documents may be preserved either in physical form or electronic form.

The officer(s) of the Company who is / are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible for preserving the Documents (authorized person).

The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure integrity and confidentiality of the Documents and prohibit unauthorised access.

The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically

7. **Archival**

- 6.1 The Company shall host all the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations on the website of the Company for a period of five years and thereafter the same shall be archived for retrieval for such period as decided by the Chief Executive Officer and/or Managing/ Whole-Time Director/ Executive Director/ Company Secretary and Compliance Officer of the Company. **Refer Annexure C.**
- 6.2 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.

- 6.3 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.
- 6.4 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.

8. **Privacy**

It shall be the responsibility of the Authorised Person, to determine how privacy laws shall apply to the Company's documents from and with respect to employees and other constituencies; to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.

9. **Destruction of Records**

The documents which are not required to be maintained and preserved permanently may be destroyed with the approval of either the Chief Financial Officer or the Company Secretary & the Compliance Officer or the relevant functional head.

However, the documents which cannot be destroyed without the approval of the Board of Directors of the Company as per the provisions of the Act or Listing Regulations, a prior approval shall be taken for disposal of such documents. Also, proper records of destruction shall be maintained for the documents so destroyed.

10. **Review and amendments**

In the event of any conflict between the Companies Act, 2013 or the SEBI Listing Regulations or any other statutory enactments and the provisions of this Policy, the Regulations shall prevail over this Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

ANNEXURE A

Documents / Record whose preservation shall be permanent in nature

S. No.	Documents / Records
1.	Certificate of Incorporation.
2.	Memorandum and Articles of Association.
3.	Agreements made by the Company with stock exchanges, depositories, etc.
4.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act and as per the applicable Secretarial Standards.
5.	Register and Index of Members, debenture-holders, if any or other security holders, if any.
6.	Register of Contracts as per Companies Act.
7.	Register of Charges as per Companies Act.
8.	Register of Investments as per Companies Act.
9.	Register of disposal of records.
10.	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register.
11.	Authorization / licenses obtained from any statutory authority.
12.	Policies of the Company framed under various regulations.
13.	Annual Reports of the Company.
14.	Material Agreements of the Company.
15.	Such other records as may be required under any law from time to time.

ANNEXURE B

Documents / Records to be preserved for a minimum period of eight years.

S. No.	Documents / Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act.
2.	Annual Returns as per Companies Act.
3.	Register of Deposits as per Companies Act.
4.	Register of Allotment (from the date of each allotment) as per Companies Act.
5.	Annual financial statements including: - Annual accounts - Directors report - Auditors report
6.	Books of accounts including Vouchers / Voucher register as defined under the Companies Act.
7.	Income Tax Returns filed under Income Tax Act, 1961.
8.	All notices in form MBP-1 received from Directors and KMPs along with any amendment thereto.
9.	Return of declaration in respect of beneficial interest in any share as per Companies Act.
10.	Copy of newspaper advertisement or publications.
11.	Compliance Reports received from any statutory authority.
12.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means.
13.	Disclosure/Return filed under SEBI Listing Regulations.
14.	Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers.
15.	Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM).
16.	Any other Document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act and/or the SEBI Listing Regulations.

ANNEXURE C

List of Documents available on the website of the Company.

S. No.	Documents / Records
1.	Basic information about the Company including the details of its businesses;
2.	All information and/or Documents required to be posted on the website as specified in the Companies Act, 2013 and/or Regulation 46(2)/Regulation 30 of the SEBI (LODR) Regulations, 2015.
3.	All Documents required to be filed with Stock Exchanges under aforesaid Regulations.
4.	Any changes in the content shall be updated within 2 working days on the website.
5.	Schedule of Analyst or Institutional Investor meet, and presentations made by the Company to them.
6.	The information/Documents provided on the website shall be preserved for a period of five years.

