



POLICY FOR PRESERVATION OF DOCUMENTS

HIMALAYAN BIO ORGANIC FOODS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

Introduction:

This policy is primarily framed pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations"). This policy is intended to ensure compliance particularly with the Listing Regulations and has been approved by the Board of Directors in its meeting held on 14th February, 2025.

Besides the above, as per applicable provisions of Companies Act, 2013, Income Tax Act, Goods and Services Act and other applicable laws, certain documents must be preserved permanently or up to a certain prescribed time. **Purpose:**

The purpose of this policy is to present a high level policy statement for **Himalayan Bio Organic Foods Limited** ("the Company") regarding preservation of its documents in the following manner:

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

The aforesaid documents may be preserved, in physical and / or electronic mode by the Company.

Accordingly, the Policy named Policy for Preservation of Documents ("the Policy") has been formulated and adopted by the Board of Directors ("the Board") of the Company.

Objectives:

The Policy has been formulated and adopted by the Board for achieving the following objectives;

- ⇒ To provide guidance for preservation of Documents to the executives and staff working in the Company;
- ⇒ To create awareness amongst executives and staff working in the Company of importance of preservation of documents for making critical decisions and undertaking other activities that may have an impact on the operations of the Company;
- ⇒ To retain and preserve its documents as the basis for communication with a range of external stakeholders;
- ⇒ To have systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business;
- ⇒ To ensure that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources.

Policy Statement:

The policy contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed

Classification of Documents:

Based on the recommendation of the management of the Company, the Board of Directors has identified following classes for Preservation of various documents;

⇒ **Category: A**

Documents that need to be preserved / retained permanently. All modifications, amendments, additions, deletions to the said document shall be preserved permanently by the Company.

⇒ **Category B**

Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR or any other applicable laws. All modifications, amendments, additions, deletions to the said document shall also be preserved for a term not less than eight years.

⇒ **Category C**

All other documents & records shall be preserved in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars and notifications etc. and where no time period is prescribed, shall be preserved for a minimum period of (Five) years.

Category A:

The Board of Directors has identified following illustrative list of various documents which requires to be preserved permanently.

- ⇒ Accounting and Finance records including Annual Financial statement
- ⇒ Tax records
- ⇒ Corporate Records including Certificate of Incorporation, Memorandum and Articles of Association of the Company, other statutory (mandatory and non-mandatory) & non-statutory Registers, Listing Agreement and approvals from other statutory authorities under the Companies Act, 2013, Listing Regulation and other statute
- ⇒ Minutes of the Board Meeting and Board Committees (Committee Meetings) as prescribed by the “Secretarial Standards-I on Meetings of “Board of Directors” issued by the Institute of Company Secretaries of India.
- ⇒ Minutes of General Meetings (including AGMs) as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India
- ⇒ Legal Files and Records – Orders/Judgement issued by Courts/Statutory bodies and other background documents relevant for understanding such orders
- ⇒ Property Records including purchase and sale deeds, licenses, copyrights, patents & trademarks
- ⇒ Insurance Records
- ⇒ Contracts entered into by the Company including Marketing Contracts
- ⇒ Payroll Records
- ⇒ Pension and retiral related Records
- ⇒ Personnel and HR Records
- ⇒ Programs & Service Records
- ⇒ Sponsorship Projects Records
- ⇒ Correspondence and Internal Memoranda
- ⇒ Electronic Documents including email retention and back up
- ⇒ Miscellaneous Records

Category B

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions/event. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

- ⇒ Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI (LODR) Regulations, 2015, as amended from time to time, shall be preserved for a minimum period of eight years from the end of financial year in which the documents/information is furnished.
- ⇒ Documents/Information submitted to Registrar of Companies / Ministry of Corporate Affairs in compliance with the Companies Act, 2013 & Rules thereunder.
- ⇒ Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees, Att and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- ⇒ Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years.

Category C

In addition to the documents mentioned in Category ‘A’ and ‘B’ above, other documents, certificates, forms, statutory registers, records, employee emails etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing Rules/ Procedures/ Practices of the Company or as per the

applicable Statutory/ Regulatory provisions in this regard..Where no time period is prescribed, shall be preserved for a minimum period of Five years.

Principle of Responsibility for Preservation of Documents:

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness tool helping the Company's and outside legal counsel to track down documents to handle the legal cases.

Suspension of Disposal of Record:

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, such employee shall inform the Company Secretary and any further disposal of documents shall be suspended until such time as the Company Secretary, after consulting the Managing Director of the Company, with the due advice from the legal counsel, determine otherwise, subject to compliance with applicable laws.

The Company Secretary in such case shall inform all employees by mail of the need to retain the documents and suspension of disposal of the same.

Back up of data:

Himalayan Bio Organic Foods Limitedensures safety of staff as well as members of the general public, safeguard the documents and records and to enable a return to normal operating with minimal disruption.

In the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Company has made appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability. The Company ensures that the digital collections and technical infrastructure required to manage and access them can be restored in the event of an emergency.

Destruction of Documents:

- ⇒ Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short - term use only.
- ⇒ The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant prescribed period as provided in the Annexure I, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved.

Conversion into Electronic Form:

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

General

Any change in the governing laws affecting the change in period of preservation of documents & records shall prevail over this Policy.

The managementof the Company is authorized to amend the Policy to give effect to any changes / amendments notified by Ministry of Corporate Affairs, Securities and Exchange Board of India or any appropriate authority from time to time.

The policy should be reviewed periodically by the Board as and when practical difficulties are encountered.
