



AJCONGLOBAL
YOUR FRIENDLY FINANCIAL ADVISORS

AJCON GLOBAL SERVICES LTD.
CIN: L74140MH1986PLC041941
POLICY ON PRESERVATION OF DOCUMENTS
(EFFECTIVE FROM 01/12/2015)
(AMENDED ON 10/11/2025)




AJCON GLOBAL SERVICES LIMITED

Regd. & Corporate Office : 408, A- Wing, Express Zone, Western Express Highway, Goregaon (East), Mumbai - 400063.
CIN : L74140MH1986PLC041941 ☎ 022 - 67160400 / 28722062 ✉ ajcon@ajcon.net



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1. Preamble

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as "SEBI (LODR) Regulations" or "Regulations"] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

2. Purpose of the policy

The Ajcon Global Services Limited (the "Company" or "AGSL") is guided by various legal, regulatory and statutory requirements as applicable from time to time, with regard to record keeping, record retention and destruction of obsolete records. The records are to be maintained based on the type and kind of records in a manner so as to comply with all applicable Acts, Rules, Regulations and Guidelines, and the retention periods indicated therein.

This policy sets the standard for classifying, managing and storing of records of the Company. The purpose of this policy is to establish a framework for effective record management and the process for subsequent archival of such records.

3. Definitions

"Act" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

"Regulations" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

"Company", "This Company", "The Company", "Company" wherever occur in the policy shall mean "Ajcon Global Services Limited".

"Current" means running matter or whatever is at present in course of passage.

"Board of Director" or "Board", means the collective body of the Directors of the

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company.

“Policy” or “This Policy” means, “Policy on Preservation of Documents.”

“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.

“Document” includes and contains all relevant information relating to the Company and necessary documentations required to be maintained under the Applicable Law.

“Electronic Form” means any contemporaneous 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.

4. Classification

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

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

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that needs to be preserved and retained permanently;
- b. Documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulations;
- c. Documents that need to be preserved and retained for such period as

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prescribed under any statute or regulation as applicable to the Company.

5. Mode of preservation

The Documents may be preserved in

- a. Physical form; or
- b. Electronic Form.

The official of the Company required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such as 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 concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.


6. Documents to be reserved permanently

- Common Seal
- Minutes books of Board, General Meetings and Committees Meeting
- Statutory Registers
- Registration Certificates, License and Permissions
- Statutory Forms and disclosures except for routine compliance.
- Annual returns together with the Annexure.
- Register of Members
- Index of Members
- Memorandum and Articles of Association as amended from time to time.
- Audited Financial Statements
- Registration certificates issued by SEBI

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- Tax Exemption and Related documents
 - Court orders.
- 7. Documents to be reserved permanently and maintained for a period of 8 years from the date of its event, unless specified under any other Act or rules, for a longer duration**
- Register of Buy back of Securities from the date of Completion of buy back.
 - Notice and Notes to agenda of the Board, committees of the Board, General Meetings and Postal ballot.
 - Books of accounts including voucher and bills.
 - Register of Transfer and Transmission of Shares/ Debentures and other securities.
 - Scrutinizer's Report on Postal Ballot and AGM.
 - Documents relating to appointment of Managerial Personnel.
 - Dividend reconciliation statement till the time the dividend is transferred to IEPF.
 - Half yearly reports submitted to SEBI pursuant to Merchant Banking Regulation.
 - Half yearly reports submitted to Stock Exchanges pursuant to Stock Broking membership.
 - All disclosure and intimations filed under SEBI, (SAST) Regulation, 2011.
 - All disclosure and intimations filed under SEBI, (PIT) Regulation, 2015.
 - TDS records shall be preserved 8 years from the end of Financial Year or completion of assessment under the applicable law is over whichever is later.
 - Income tax papers shall be preserved 8 years from the end of Financial Year or completion of assessment under the applicable law is over whichever is later.
 - Service Tax papers shall be preserved 8 years from the end of Financial Year or completion of assessment under the applicable law is over whichever is later.

8. Disposal of Records (Physical, Electronic & Emails)

After the period specified in the concerned statute is over, the documents/records may be destroyed as provided hereunder:

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Physical Records

After completion of the retention period, the records maintained in physical form may be destroyed, unless required to be preserved for any purpose, such as ongoing litigation or regulatory directive. The concerned Department Head will authorize destruction of the records and the same will be destroyed in the presence of a person authorized for the purpose, who shall ensure their destruction in accordance with practices that preserve the security of the information contained in them. The Department will maintain a list of the records so destroyed, which shall be signed by the person authorized as above.

Electronic Records

After completion of the retention period, the records maintained in electronic form may be deleted, unless required to be retained for any purpose, such as ongoing litigation or regulatory directive. The concerned Department Head will authorize the deletion of the records. The Department will maintain a list of the records so deleted, which shall be signed by the person authorized for the purpose. b) The IT Department shall maintain a procedure to delete records no longer required to be retained, from back-up servers and for appropriately purging emails no longer required to be maintained.

Emails

Disposal / deletion of all retained mail will be decided based on business requirements, policies and other statutory requirements from time to time.

Regulatory provisions

Where the law provides for any specific procedure for destruction of any records, such as board authorization for destruction of unused share certificates, it shall be ensured that such procedure is followed.

9. Review of Policy

This policy shall be subject to review, if necessary. Any change/ amendments in applicable statutes with regard to maintenance and preservation of documents and records shall be deemed to be covered in this policy without any review. Any Change/ amendments to this policy shall be approved by the Managing Director.

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