POLICY FOR PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

Policy	**Policy for Preservation of Documents & Archival Policy**	**Date of Adoption**	**10th January, 2022**
Policy No.	**HEIL/FIN/POL/2025/0013/01**	**Effective Date**	**10th January, 2022, as amended from time to time**
Issuing Authority	**Board of Directors**	**Date of last Modification**	**6th November, 2025**

1. REGULATORY FRAMEWORK

1.1 This policy ("**Policy**") of Harsha Engineers International Limited *(formerly known as Harsha Engineers International Private Limited and Harsha Abakus Solar Private Limited)* ("**Company**") has been prepared and adopted in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations"**) as amended from time to time.

1.2 Regulation 9 of Listing Regulations requires the Board of Directors of the Company to formulate a policy for preservation of documents classified into two categories:

i. **1.2.1** Documents whose preservation shall be permanent; and
ii. **1.2.2** Documents to be preserved for not less than eight years (8 years) after completion of the relevant transactions.

1.3 Regulation 30 (8) of Listing Regulations requires the Company to frame an Archival Policy to determine the period for which all the events and information disclosed to the stock exchanges by the Company shall be hosted on the website of the Company.

1.4 The Board of Directors shall review the policy periodically and may amend the same from time to time, as may be deemed necessary.

2. APPLICABILITY

This Policy is applicable to all documents maintained in physical and electronic mode by the Company.

The documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

3. MODE OF PRESERVATION

The company shall keep the documents in electronic mode or physical mode and in such manner as the Board of Directors may deem fit such that the records are maintained in accordance with Listing Regulations and Companies Act, 2013 and rules and regulations made thereunder. `

4. DOCUMENTS TO BE PRESERVED PERMANENTLY

A. Companies Act, 2013

1. Memorandum and Articles of Association as amended from time to time
2. Certificate of Incorporation
3. Certificate of Commencement of Business
4. Register of Contracts
5. Register of Directors and KMPs and the securities held by them
6. Register of Loans and Investments made by the Company
7. Register of Index and Members
8. Minutes of the Board, Committees of the Board, General Meetings including meetings conducted through Postal Ballot
9. Resolutions passed by circulation
10. Various forms and returns filed with the authorities
11. Audited Financial Statements
12. Excise Returns, Income Tax Returns, Sales Tax Returns, Service Tax Returns
13. Order issued by Courts/ Statutory Bodies
14. All acquisitions and merger related papers

B. Listing Regulations

1. Listing Agreement executed with the Exchange
2. Trading approval relating to listing of securities
3. Offer documents for Public issue and private placement of securities filed with SEBI

C. Depositories Act

1. Confirmation of all Corporate Actions with respect to allotment of securities

2. Intimation on allotment of ISIN for securities issued

D. Others

1. Register of Records and Documents destroyed

E. Any other documents as may be required to be maintained permanently under applicable laws, maintained and preserved from time to time

5. DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN 8 YEARS

A. Companies Act, 2013

1. Register of Buy-Back of securities from the date of completion of Buy-Back

2. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballot

3. Notices pertaining to disclosure of Interest by the Directors

4. Annual Returns with annexures

5. Register of Charges

6. Register of Debentures

7. Books of Accounts including vouchers and bills

8. Register of transfer and transmission of shares

9. Register of renewed and duplicate certificates

10. Documents relating to appointment of Managerial Personnel

11. Dividend reconciliation statement till the time the dividend is transferred to IEPF

12. Scrutinizers Report on AGM and Postal Ballot

B. Listing Regulations

1. All reports filed with the Stock Exchange from time to time

2. Disclosures of various events and press releases

3. Intimations of Board Meetings

C. Other SEBI Regulations

1. SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011

2. SEBI (Prohibition of Insider Trading) Regulation, 2015

3. SEBI (Share Based Employee Benefit) Regulation, 2014

4. SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines, 1999

6. DISCLOSURES

The Company shall disclose this Policy on its website.

7. GENERAL, POLICY REVIEW & AMENDMENT

The Policy shall be reviewed annually and as and when required due to changes in applicable laws, regulations, or organizational priorities. The review aims to ensure continued relevance, effectiveness, and alignment with best practices. The outcomes of such reviews shall be documented, and any necessary amendments shall be promptly implemented upon approval by the Board of Directors.

In case any amendment(s), clarification(s), circular(s) and guideline(s) issued by Securities and Exchange Board of India/Stock Exchanges, that is not consistent with the requirements specified under this Policy, then the provisions of such amendment(s), clarification(s), circular(s) and the guideline(s) shall prevail upon the requirements hereunder and this Policy shall stand amended accordingly effective from the date as laid down under such amendment(s), clarification(s), circular(s) and guideline(s). Such amendments shall be brought to the attention of the Board of Directors.

******