

APM INDUSTRIES LIMITED

POLICY ON DOCUMENT PRESERVATION & ARCHIVAL OF DOCUMENTS:

APM Industries Limited has formalized a Document Preservation Policy with a view to identify, classify and preserve the documents according to the nature of the documents.

Statutory Mandate & Objective:

The policy on preservation and archival of documents is mandated by the provisions of Chapter III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR"). With this policy, the Company intends to safeguard significant documents and preserve them to ensure durability of documents including documents in electronic form.

This policy may be reviewed by the Board of Directors and amendments made, to comply with any requirements under any statute or regulation, from time to time.

Process:

A) Permanent Preservation:

- 1) All documents filed with Ministry of Corporate Affairs.
- 2) All documents filed with SEBI / BSE (Stock Exchange).
- 3) All documents filed with Tax Authorities in Income Tax, Service Tax, VAT & similar tax authorities.
- 4) All permits, licenses, authorization from any statutory authorities.
- 5) Audited Accounts
- 6) Documents relating to investment in subsidiaries, if any.
- 7) Any other document required to be preserved permanently under any law / statute.

B) Preservation for 8 years:

- 1) Bank, cash vouchers, payment vouchers, warrants
- 2) Bank statements
- 3) Purchase bills
- 4) Sales invoices, Debit / credit notes, etc.
- 5) Accounting records
- 6) Any documents related to correspondence with Customs at CFS
- 7) Any other documents required to be preserved for 8 years under any law / statute.

C) Other Documents maybe stored and preserved in physical form/ electronic form, after the completion of the relevant transactions, for such period as may be required, in each case.

Electronic Documents including email retention and back up Electronic Mail:

- I. All e-mail – from internal and external sources to be deleted after they cease to be of current use.
- II. Employees should keep emails related to current business issues.
- III. I.T Department would archive email for 7 years on email archival server after the employees have deleted it, post which time the email will be permanently deleted.
- IV. Employee will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the respective Head of Department.
- V. Employees will take care not to send confidential information to outsiders.

Web page files:

- All such events / information hosted on the Company's website shall be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
- After the initial period of 5 years, documents / information (except documents of permanent nature) shall be archived by the I.T. department for a further period of 3 years.
- Documents of permanent nature, uploaded on the Company's website, shall be archived by the I.T. Department.

Responsibility:

- The responsibility for preservation of the documents will be on the concerned department heads. Head of the I.T. Department will be responsible for all the documents preserved in electronic mode.