

**THINKSEMI INFOTECH LIMITED**

**POLICY ON PRESERVATION OF DOCUMENTS**





## 1. PREAMBLE

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Thinksemi Infotech Limited ('**Company**') is a public limited company incorporated in India. As a listed entity it is guided by various legal and regulatory requirements, including those outlined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('**SEBI Regulations**'). The SEBI Regulations *inter alia* mandate listed companies to have a policy for the preservation and archival of documents, approved by their board of directors. Thinksemi Infotech Limited, in line with its regulatory obligations, has adopted a Policy on Preservation & Archival of Documents ('**Policy**') to classify and maintain various records and registers crucial for business continuity and compliance. This Policy ensures the preservation of documents either permanently or for specific periods, as required by law. By adhering to the SEBI Regulations, the Company demonstrates its commitment to transparency, governance, and regulatory compliance in its operations as a listed entity.

Further, Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI Listing Regulations) requires every listed company to formulate a Policy on Preservation of Company Documents which shall be approved by the Board of Directors.

Further, Regulation 30 (8) of the SEBI Regulations requires the listed entity to disclose on its website all such events or information which has been disclosed to stock exchange(s) under the said regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

Therefore, this Policy is formulated to comply with the said regulations. The Board of Directors of the Company have adopted this Policy at its meeting held on <date><month>, 2025.

## 2. OBJECTIVE OF THE POLICY

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Thus, this policy ("Policy") is framed with an objective of classifying records, registers, returns etc. 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:

for the purpose of such maintenance and preservation as prescribed.

## 3. DEFINITIONS

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Unless repugnant to the meaning or context thereof, the following expressions, wherever used in this Code, shall have the meaning assigned to them below:

- i. "**Books of Accounts**" as defined in Section 2(13) of the Act.
- ii. "**TFML**" or the "**Company**" means Thinksemi Infotech Limited.



- iii. **“Documents”** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic
- iv. storage devices etc., and the like as required to be maintained under any law or regulation.
- v. for the time being in force.
- vi. **“Maintenance”** means keeping documents, either physically or in Electronic Form
- vii. **“Policy”** means this Policy on Preservation of Company Documents.
- viii. **“SEBI Listing Regulations”** means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.

#### **4. PRESERVATION OF DOCUMENTS**

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The Documents shall be preserved under following two categories:

(i) PERMANENT NATURE:

The documents of a **permanent nature** which is given in Annexure 1 shall be maintained and preserved permanently by Thinksemi Infotech Limited (“Thinksemi Infotech” or “the Company”) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

(ii) SPECIFIED PERIOD

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions which is given in Annexure 2 which shall be preserved by the Company for the term **not less than eight years** after completion of the relevant transactions 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 a term not less than eight years.

In the event the Company is served with any notice for documents from any of the statutory authorities or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of such notice or litigation shall be suspended until such time the matter is settled, resolved or disposed off. The relevant authorised person shall be responsible for informing all relevant employees of the Company about suspension of further disposal of documents.

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of functions falling under the charge of each of them, in terms of this Policy. They shall also designate an authorised person who shall ensure compliance of this Policy.



## **5. ARCHIVAL OF DOCUMENTS**

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In accordance with Regulation 30 (8) of the SEBI Regulations, copies of all material disclosures made to the stock exchanges under Regulation 30 of the LODR Regulations shall be hosted on the website of the Company for a minimum period of 5 years. After a period of 5 years from the date of filing the records or documents with the stock exchanges, the copies of such records or documents shall be archived from the website of the Company for a period of 3 years.

## **6. DESTRUCTION OF DOCUMENTS**

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After the expiry of the statutory retention period, subject to any statutory procedure stipulated in relation to destruction of records, the preserved documents may be destroyed by the concerned department that has the responsibility of maintaining such records or as decided by the Board, unless required to be preserved for a specific purpose, such as ongoing litigation or regulatory directive.

Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

Documents may be destroyed by recycling non-confidential paper records, shredding or otherwise rendering unreadable confidential paper records: or deleting or destroying electronically stored data.

The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records which shall be maintained by the Company in the format prescribed by the Board. The entries in the Register shall be authenticated by the concerned department head or the person authorised by the Board in the said regard.

## **7. AMENDMENT TO THE POLICY**

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The policy would be reviewed on an annual basis by the Board of Directors. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors. However, the amended regulatory requirements will supersede the existing Policy till the time Policy is suitably amended.

**For and on behalf of  
THINKSEMI INFOTECH LIMITED**

  
**Sudharsan Ramajayam**  
**Managing Director,**  
**DIN: 07502681**  
Date: August 25, 2025  
Place: Chennai



**“ANNEXURE – 1”**  
**DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN**  
**NATURE**

<b>Sr. No.</b>	<b>Documents</b>
1.	Incorporation Documents
2.	Memorandum of Association and the Articles of Association of the company
3.	Minutes of General Meetings, Board Meetings, and various committee meetings
4.	Register of Members along with Index
5.	Foreign Register of Members, if any
6.	Register of loans, guarantee, security, and acquisition made by the Company
7.	Register of investments not held in its own name by the Company, if any
8.	Register of contracts with related parties and contracts and bodies in which directors are interested
9.	Register of Charges
10.	Registers of renewed and duplicate share certificates
11.	Register of Directors and Key Managerial Personnel
12.	Merger Order(s) issued by Hon'ble High Court/National Company Law Tribunal, if any
13.	Approvals and Product Registration & licenses received from statutory authorities, Central & State government
14.	Intellectual Property Documents including Copyrights, Trademarks, Patents, and Industrial Designs owned by the company
15.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.




“ANNEXURE – 2”

**DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF RELEVANT TRANSACTION**

<b>Sr. No.</b>	<b>Documents</b>
1.	Books of account including relevant books and papers and financial statements.
2.	Register of Debenture holders or Register for any other Securities issued by the Company
3.	Annual return and copies of all certificates and documents required to be annexed thereto
4.	E-forms filed with the Registrar of Companies
5.	Disclosure of Interest received from the Directors
6.	Attendance Registers of Board Meetings, General meeting, Committee Meeting along with Notices, Agenda, and related papers of all meetings
7.	Attendance slips of General Meetings
8.	Registers of Fixed assets
9.	Instrument creating or modifying a Charge
10.	Changes to the Memorandum of Association and the Articles of Association
11.	Tax Records including documents concerning tax assessment, filings, proof of deductions, tax returns, and appeals
12.	Employment/Personnel Records for eight years post-employment cessation
13.	Register of Deposits accepted or renewed
14.	Register of Fixed Assets
15.	Register of Proxies
16.	Relevant marketing and sales documents
17.	Legal documents like contracts, legal opinions, pleadings, court orders, judgments, and property-related documents
18.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

For and on behalf of  
**THINKSEMI INFOTECH LIMITED**

  
**Sudharsan Ramajayam**  
Managing Director,  
DIN: 07502681  
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LECTURE 1

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