

**MAESTROS ELECTRONICS & TELECOMMUNICATIONS SYSTEMS  
LIMITED**

**POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS &  
RECORDS**



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**Maestros Electronics & Telecommunications Systems Limited**

EL-66, TTC Industrial Area, Electronic Zone, Mahape, Navi Mumbai – 400 701 Maharashtra, India

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## **INTRODUCTION:**

The Securities and Exchange Board of India (“SEBI”) vide its notification dated September 02, 2015, has issued the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015. The Regulation come into effect from December 01, 2015. The Regulations mandated listed entities to formulate an archival policy. It is in the context that the Policy on Archival of Documents (“Policy”) is being framed and implemented.

### **1. OBJECTIVE:**

- 1.1. The objective of this Policy is to lay down the principles for the preservation of documents and records of the Company.

### **2. REGULATORY FRAMEWORK:**

- 2.1. Regulation 9 of the SEBI Regulations requires listed entities to have a Policy on Preservation of documents approved by its Board of Directors, classifying the documents in at-least two categories, which are as follows:
  - a. Documents whose preservation shall be permanent in nature; and
  - b. Documents with preservation period of not less than eight years after completion of the relevant transactions.
- 2.2. Also, the listed entity is required to disclose on its website all such events or information which has been disclosed to stock exchanges where the securities of the Company are listed (“Stock Exchanges”) under Regulation 30(8) of Listing Regulations. Further, such disclosures shall be hosted on the website of the Company for a minimum period of 5 or 2 years as applicable and thereafter as per the archival policy.
- 2.3. Accordingly, this policy is framed as per the requirements of the SEBI Regulations.

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### **3. DEFINITIONS:**

- 3.1. **“Act”** shall mean the Companies Act, 2013 including the Rules made thereunder.
- 3.2. **“Archival”** means accumulation/storage of historical records on server/network or at a physical place.
- 3.3. **“Company”** shall mean Maestros Electronics & Telecommunications Systems Limited.
- 3.4. **“Documents” or “Records”** mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company.
- 3.5. **“Key Managerial Personnel”** shall mean the Key Managerial Personnel of the Company as defined under the Act.
- 3.6. **“Preservation”** means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.
- 3.7. **“Policy”** shall mean the Policy on Preservation & Archival of documents and records.
- 3.8. **“SEBI Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued thereunder, including any statutory modifications or re-enactments thereof for the time being in force.

### **4. POLICY:**

#### **4.1. Preservation**

- 4.1.1. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Agreement and the SEBI Regulations and any all other applicable law, rules, regulations, internal policies of the Company, in force.
- 4.1.2. As per the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 the listed entity is required to

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disclose on its website all such events or information which has been disclosed to stock exchanges where the securities of the Company are listed (“Stock Exchanges”) under Regulation 30(8) of Listing Regulations. Further, such disclosures shall be hosted on the website of the Company for a minimum period of 5 and thereafter preserve as per the archival policy of the Company.

Further, as per the Securities and Exchange and Board of India(Listing Obligation and Disclosure Requirements)(Third Amendment) Regulations, 2024 w.e.f. 13.12.2024, the audio/video recordings of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means shall be required to be hosted on the website of the listed entity for a minimum period of two years and thereafter as per the preservation policy of the listed entity in terms of clause(b) of regulation 9. However, the transcripts of such calls shall be required to 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 in terms of clause(b) of regulation 9.

## 4.2. Archival

- 4.2.1. The document and records which are no longer current, but which are required to be preserved for a specified period of time or permanently under the applicable laws/ rules/ regulations shall be archived by the Company.
- 4.2.2. Every Function/Unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy.
- 4.2.3. Every Function/Unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- 4.2.4. The documents and records may be archived in physical and/or electronic mode and shall be stored in the premises of the Company in case of physical documents and on the server of the Company and/ or the server of any third-party vendor/ service provider in case of electronic documents having appropriate security and safety measures.

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- 4.2.5. The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.
- 4.2.6. Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed in one of the following ways:
- a. Recycle non-confidential paper records;
  - b. Shred or otherwise render unreadable confidential paper records; or
  - c. Delete or destroy electronically stored data.

## **5. GENERAL:**

- 5.1. The Policy would be subject to revision/ amendment in accordance with the applicable laws.
- 5.2. The Company delegate its rights to alter, modify, add, delete or amend any of the provisions of this policy to Board of Directors of the Company.
- 5.3. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc., even if the same is not incorporated in this Policy.

## **6. WEBSITE:**

The company shall disclose this policy on the website of the company.

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