MACH TRAVEL SOLUTIONS LIMITED
(Formerly known as Mach Conferences and Events Limited)

PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

1. SCOPE & PURPOSE OF THE POLICY

A policy on preservation of documents would ensure safe-keeping of the records and safeguard the documents from getting mishandled, while at the same time avoiding overflow of inventory of documents.

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, requires 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.

Regulation 30 (8) of SEBI LODR Regulations requires to create and maintain an Archival Policy and therefore forms part of this Policy. This Policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of the Companies Act, 2013.

2. OBJECTIVE OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

➢ To identify statutory records to be preserved.

➢ To identify records to be maintained either for a period of eight (8) years or permanently.

➢ To decide the mode of preserving the documents, whether in physical form or in electronic form.

➢ To help employees understanding their obligations in retaining and preserving the documents and records.

➢ Effective corporate governance and risk management;

➢ Effective information management to support the work of the administrations and provision of continued access to it at times when needed;

➢ Systematic disposal/destruction of Company's non-current records that have outlived their administrative usefulness;

➢ Identification of the Company's records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company's Archives.

3. DEFINITIONS

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

1. **"Act"** means the Companies Act, 2013.

2. **"Archival"** means the accumulation/storage of historical records on server/network or at a physical place.

3. **“Applicable Law”** means any existing or new enactments, circulars, Laws, Rules, Regulations issued by the Government of India/State Governments or laws enacted by any overseas country which has an impact on the Company’s businesses as also rules, regulations or standards which are issued by any statutory bodies in India and governing the Company.

4. **“Authorised Person”** means any person duly authorised by the Board.

5. **“Board”** means the Board of Directors of the Company or any of the Committees constituted by it.

6. **“Books of Accounts”** as defined in Section 2(13) of the Act.

7. **“Company”** means **“Mach Travel Solutions Limited”** or **“MACHLTD”.**

8. **“Current Documents”** means any document, that still has an ongoing relevance without limitation or reference to any ongoing litigation, proceedings, complaint, dispute, contract or the like matter.

9. **“Documents”** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form and does not include multiple or identical copies.

10. **“Electronic Records”** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

11. **“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 or access thereto.

12. **“Maintenance”** means keeping documents, either physically or in electronic form.

13. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

14. **“Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

4. PRESERVATION OF DOCUMENTS

The Documents shall be preserved under following two categories:

(i) PERMANENT NATURE:

The documents of a **Permanent Nature** which are given in **Annexure 1** shall be maintained and preserved permanently by Mach Travel Solutions Limited (“**MACHLTD**” 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 are given in **Annexure 2** 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 of. 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. MODES OF PRESERVATION

1. The Documents may be preserved in
   a. Physical Form, and/or in
   b. Electronic Form

2. The Officer of the Company required to preserve the document shall be an Authorised Person, who is generally expected to observe the compliance of requirements of applicable law.

3. The preservation of documents should be such as to ensure that there is no tampering, alteration and destruction. Nothing shall be done which endangers the content, authenticity, utility or accessibility of the Documents.

4. The preserved documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the documents and to prohibit unauthorized access.

6. DESTRUCTION OF DOCUMENTS

The documents specified in **Annexure 2** which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and manner as specified and approved by the Board.

7. ARCHIVAL POLICY

The Company shall disclose on its website all such information as prescribed by the Companies Act, 2013, Listing Regulations and any other applicable law. The Company shall also disclose on its website all such events or information which has been disclosed to stock exchange(s) under Regulation 30(8) of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a minimum period of five (5) years as mentioned in **Annexure 3** and thereafter the same shall be archived for a period of three (3) years and thereby destroyed as per this Policy.

➢ 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.

➢ The documents and records may be archived in physical and/or electronic mode as the Board of Directors of the Company may deem fit.

➢ The documents and records archived in electronic form shall be backed up automatically on a periodic basis.

➢ Documents and records which are no longer required to be preserved as per the provisions of this Policy may be destroyed in such manner as prescribed by the Company's Board of Directors.

8. AMENDMENT TO THE POLICY

The policy will be reviewed by the Board of Directors every 3 years. 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.

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“ANNEXURE – 1”

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

Sr. No.	Documents
1	Property records including purchase and sale deeds, licences, copyrights, patents, trademarks & Other intellectual property rights.
2	Certificate of Incorporation / Commencement of Business
3	Memorandum & Articles of Association
4	Minutes of Board, Committee and Shareholders’ Meetings
5	Register of Members and other Statutory Records
6	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases
7	Agreements made by the Company with Stock Exchanges, Depositories, etc.
8	License and Permissions
9	Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10	Authorization / licenses obtained from any statutory authority
11	Policies of the Company framed under various regulations
12	Register of Power of attorneys, if any
13	Any other documents as may be applicable under any law, rules or regulation

"ANNEXURE – 2"

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

Sr. No.	Documents
1	Books of account including relevant books and papers and financial statements.
2	Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
3	Instrument creating a charge or modification
4	Registers of Fixed Assets
5	Attendance Register of Board Meetings
6	Attendance Register of Committee Meetings
7	Attendance Slips of General Meetings
8	Register of Deposits
9	Register of Proxies
10	E-forms filed with the Registrar of Companies
11	Annual Report including: ➢ Annual accounts ➢ Director's report ➢ Auditors report
12	Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for appeal, as the case may be.
13	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
14	Disclosure/Return filed under SEBI LODR Regulations
15	Annual return and copies of all certificates and documents required to be annexed thereto
16	Employment /Personnel Record should be retained for a period of eight (8) years following cessation of employment in case of employees of the Company.
17	Any other documents as may be applicable under any law, rules or regulation

"ANNEXURE – 3"

DOCUMENTS WHICH ARE TO BE MAINTAINED ON WEBSITE OF THE COMPANY FOR A MINIMUM PERIOD OF FIVE (5) YEARS

Sr. No.	Documents
1	Disclosure of all events and information provided to the Stock Exchanges as per the Listing Regulations
2	Investor Presentation and audio video recordings/transcripts of investor calls
3	Press Release

This manual lists the periodicity for which the above records are to be maintained, the Department which is responsible for maintenance and the Authorised person who will be in charge of preservation and destruction of the Records in terms of the Policy.

1. Accounting and Financial records including Financial Statements

(Department Responsible – Finance & Accounts)

Sr. No	Record Type	Authorised Person	Retention Period
1	Accounts Payable ledgers and schedules	Head of the Finance & CFO	8 years
2	Accounts Receivable ledgers and schedules		8 years
3	Records maintained in respect of Assets and liabilities of the Company		8 years
4	Annual Audit Reports and Financial Statements (Including Interim Financial Statements and Schedules) and other documents / records that are related to the audit		8 years
5	Bank Statement		8 years
6	General Ledger		8 years
7	Fixed Asset Register		8 years
8	Books of accounts and related accounting and financial records		8 years

2. Tax records

(Department Responsible – Finance & Accounts)

Sr. No	Record Type	Authorised Person	Retention Period
1	Tax Bills, Receipts, Statements	CFO and Head of Taxation	8 years. (In case the record is a subject matter of any litigation then for a period of 8 years after a final Order has been received in this regard)
2	Tax Returns		
3	Tax computation details / Other direct tax related Records		
4	Service Tax Records		
5	Central Sales Tax / VAT/GST related Records		
6	Excise / Customs / Other indirect tax related Records		

3. Corporate Records including Certificate of Incorporation and approvals from Statutory Authorities

(Department Responsible – Secretarial)

Sr. No	Record Type	Authorised Person	Retention Period
1	Certificate of Incorporation, Certificate of commencement of business, Certificate of change of name (if any)	Company Secretary & Compliance Officer	Permanent
2	Memorandum and Articles of Association as amended from time to time		Permanent

3	Listing Agreement signed with stock exchanges / Agreement with Registrar and Share Transfer Agent	Company Secretary & Compliance Officer	Permanent
4	Minutes Books of General Meetings, Board Meetings and Committee Meetings		Permanent
5	Statutory Registers		Permanent
6	Share certificates, including the blank forms of share certificates		Not less than thirty years and in case of disputed cases, shall be preserved permanently
7	Statutory disclosures / forms / returns filed with various regulatory authorities		8 years
8	Notice of General Meeting, scrutiniser's report and related documents		8 years
9	Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers		8 years
10	Disclosures / Notices by a director of his interest		8 years
11	Attendance Register for attending meetings of Board/ committees / proxy forms and attendance slips for general meetings		Permanent
12	Register of Deposits, if any		Permanent
13	Instrument creating a charge or modification		8 years from the date of satisfaction of charge
14	Annual return and copies of all certificates and documents required to be annexed thereto		Permanent

4. Legal Records

(Department Responsible – Legal)

Sr. No	Record Type	Authorised Person	Retention Period
1	Legal Memoranda and Opinions		8 years after the closure of the matter
2	Litigation files		8 years after attaining finality of the case(s)
3	Orders passed by any Court / Tribunal / Any Authority other than in recovery suits which are final in nature and cannot be superseded.		Permanent
4	Interim orders		Till the final order is received or for a period of 8 years, whichever is higher
5	Pleadings		For a period of 8 years or till the matter has

			been disposed off, whichever is higher.

5. Payroll Records & Personnel and HR related Records

(Department Responsible – Human Resources)

Sr. No	Record Type	Authorised Person	Retention Period
1	Employee Deduction Authorization	Head of HR	8 years after termination of service of employment
2	Payroll Deductions		8 years after termination of service of employment
3	Payroll Registers (Gross and Net)		8 years after termination of service of employment
4	Time Cards / Sheets		8 years
5	Unclaimed Wage Records (if any)		8 years
6	Leave Records		8 years after the relevant period
7	Employee related Correspondence		8 years after termination of service of employment
8	PF/ Gratuity Trust Deeds		Permanent
9	Personnel files of individual employees		8 years
10	Commission / Bonuses / Incentives / Awards		8 years
11	Employee Earnings Records		8 years after termination of service of employment
12	Employee Medical Records		8 years after termination of service of employment
13	Attendance records, application forms, job or promotion records, performance		8 years after termination of service of employment
14	Employment Contracts – Individual		8 years after termination of service of employment
15	Correspondence/Agreements Advertisements for job openings		8 years
16	Insurance Policies of the Company		8 years

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