



Knowledge is wealth

## **RECORDS AND ARCHIVES MANAGEMENT POLICY**

[Pursuant to Regulation 9 and 30(8) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

### **1. PURPOSE:**

The Board of Directors (“the Board”) of Navneet Education Limited (“the Company”), has adopted this Records and Archives Management Policy (“the Policy”) to establish the framework needed for effective preservation/ maintenance of documents and records of the Company required to be maintained under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Listing Regulations”).

### **2. OBJECTIVE:**

The objective of this Policy is to ensure that the documents / records required to be prepared and disclosed to the stock exchanges pursuant to the Listing Regulations (“the Listing Records”), whether physically or in electronic form be preserved for a minimum period of 8 years from the date of completion of relevant transaction.

Further, if any other applicable law requires the preservation of any of these Listing Records for a longer period or permanently, then those shall be preserved / maintained accordingly.

### **3. POLICY FOR PRESERVATION / MAINTENANCE:**

The Listing Records created in physical form shall be scanned and maintained in electronic form as well. The electronic communication shall be maintained on the Company server in a year wise folders.

Further, the safety of the Listing Records in electronic form is to be achieved as per the relevant IT policy of the Company whereas the physical records shall be in the custody of the Company Secretary.

The Listing Records shall be preserved for a minimum period of 8 years from the date of completion of relevant transaction.

#### **4. PLACE OF PRESERVATION / MAINTENANCE:**

The Listing Records shall be preserved / maintained at the Registered Office of the Company unless any other law requires / allows it to be maintained at any other place, in which case the same shall be kept at such place.

#### **5. ACCESS / RETRIEVE:**

The Managing Director, CFO and the Company Secretary and his/her subordinate(s) (direct report) in the Secretarial Department or any other person authorized by any one of these, shall have access to the Listing Records.

#### **6. ROLE OF REGISTRAR AND SHARE TRANSFER AGENT:**

The Registrar and Transfer Agent of the Company shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained with them. The Company shall obtain an annual undertaking / confirmation from the Registrar and Transfer Agent of the Company in this regard.

The Company Secretary shall verify the Listing Records annually by visiting Registrar and Transfer Agent's office and checking the appropriate maintenance of the Listing Records by them.

#### **7. VERIFICATION OF RECORDS:**

The Company Secretary shall once in a year carry out the process of self-verification and submit a certificate to the Board in relation to preservation / maintenance of the Listing Records.

#### **8. ARCHIVAL POLICY:**

The Company shall ensure that all the information disclosed on the Company's website ([www.navneet.com](http://www.navneet.com)) is maintained live and in archive for a period of 5 years.

#### **9. PERSON RESPONSIBLE:**

The Company Secretary shall be responsible for ensuring compliance under this Policy.

#### **10. AMENDMENT:**

This Policy shall not be amended unless the amendment is approved by the Board of Directors or unless such amendment is required pursuant to change in the applicable law.