

TRIDENT LIMITED

Name of the Policy	Policy for Preservation of documents
Policy Custodian	Company Secretary
Date of Latest amendment/review	• November 14, 2023 • May 19, 2026

POLICY FOR PRESERVATION OF DOCUMENTS

PREFACE

Trident Limited (“Trident” or “the Company”) is governed by the Companies Act, 2013 (“the Act”), the rules and regulations framed thereunder by Ministry of Corporate Affairs (“MCA”) and Securities and Exchange Board of India (“SEBI”) (Listing obligations and Disclosure Requirements) Regulations, 2015 (“LODR Regulations”). Regulation 9 of LODR Regulations, mandates listed entities to frame and adopt a Policy for Preservation of Documents (hereinafter referred to as Policy)

OBJECTIVE

The objective of this Policy is to classify the documents, records and registers of the Company which are required to be preserved. The categories according to the preservation period have been defined as follows:

- A. Documents and records whose preservation shall be permanent in nature;
- B. Documents and records with preservation period of not less than eight years after completion of the relevant transactions;
- C. Documents whose preservation period are not covered under clause (A) and (B) above.

A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT:

The illustrative list of the documents which shall be preserved on permanent basis are as follows:

S. No.	Name of the document	Regulation
1.	All the documents and information filed at the time of Incorporation including Memorandum and Articles of Association the company duly signed by all the subscribers to the Memorandum and any alteration made therein along with Certificate of Incorporation and such other certificates issued by Registrar of Companies for alteration in the Memorandum and Articles of Association.	Section 7 (4) and 15 of the Act
2.	Register of renewed and duplicate share certificates	Section 46 of the Act read with rule 6(3) of the Companies (Share Capital and Debentures) Rules, 2014
3.	Records of disputed share certificates	Section 46 of the Act read with rule 7(3) of the Companies (Share Capital and Debentures) Rules, 2014
4.	Register of Charges	Section 85 of the Act read with rule 10(4) of the Companies (Registration of Charges) Rules, 2014

5.	Register of members along with index of members and foreign register of members, if any (unless explicitly discontinued)	Section 88 of the Act read with rule 15 of the Companies (Management and Administration) Rules, 2014
6.	Minutes of the Board Meetings, General Meetings and Committee meetings	Section 118 of the Act read with Rule 25 of the Companies (Management and Administration) Rules, 2014, Para 8.1 of SS-1 and Para 18.1 of SS-2
7.	Register of Loans, Guarantees, Security, and Acquisitions	Section 186 of the Act read with Rule 12(3) of the Companies (Meetings of Board and its Powers) Rules, 2014
8.	Register of Investments of the Company not held in its own name	Section 187 of the Act read with Rule 14(3) of the Companies (Meetings of Board and its Powers) Rules, 2014
9.	Register of Contracts or Arrangements in which Directors are Interested	Section 189 of the Act read with Rule 16(3) of the Companies (Meetings of Board and its Powers) Rules, 2014
10.	Such other registers / documents as may be required to be maintained/preserved permanently under the Act.	

B. DOCUMENTS WHICH SHALL BE PRESERVED FOR 8 YEARS:

The illustrative list of the documents which shall be preserved for 8 years are as follows:

S. No.	Name of the document	Section/Rule/Regulation
1.	Registers of deposits	Rule 14 of Companies (Acceptance of Deposits) Rules, 2014
2.	Instrument creating a charge or modification thereon shall be preserved for a period of eight years from the date of satisfaction of charge	Section 85 read with rule 10 (4) of the Companies (Registration of Charges) Rules, 2014.
3.	Register of debenture holders or any other security holders along with index shall be preserved for a period of eight years from the date of redemption of debentures or securities, as the case may be.	Rule 15(2) of the Companies (Management and Administration) Rules, 2014
4.	Foreign register of debenture holders or any other security holders shall be preserved for a period of eight years from the date of redemption of such debentures or securities.	Rule 15(4) of the Companies (Management and Administration) Rules, 2014
5.	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto	Section 88 of the Act read with rule 15 of the Companies (Management and Administration) Rules, 2014

6.	Books of account of every company together with the vouchers relevant to any entry in such books of account.	Section 128(5) of the Act
7.	Disclosures / Notices by a director of his interest	Rule 9 of Companies (Meetings of Board and its Powers) Rules, 2014
8.	Attendance Sheets/register of Board and Committee Meeting	Para 4.1.6 of SS-1
9.	Office copies of the Board and Committee Meeting Notices, Agendas and Notes on Agendas and related papers	Para 8.2 of SS-1
10.	Office copies of Notices, scrutinizer's report, and related papers of the General Meeting	Clause 18.2 of SS-2
11.	Proxy Register	Para 6.9 read with Para 18.2 of SS-2
12.	Intimation of appointment of Share Transfer Agent	7(5) of the LODR Regulations
13.	Listing Fees paid to the recognized stock exchange(s).	14 of the LODR Regulations
14.	Quarterly Corporate Governance Report	Regulation 27(2) of the LODR Regulations
15.	In-principal approval of recognized stock exchange(s)	Regulation 28(1) of the LODR Regulations
16.	Prior Intimations of Board Meeting	Regulation 29(1) of the LODR Regulations
17.	Disclosure of information or events	R30 of the LODR Regulations
18.	Shareholding Pattern	Regulation 31(1) of the LODR Regulations
19.	Statement of deviation or variation in use of issue proceeds	Regulation 32(1) of the LODR Regulations
20.	Record date or date of closure of transfer books	Regulation 42(2) of the LODR Regulations
21.	Change in name of listed entity	Regulation 45(3) of the LODR Regulations
22.	Reconciliation of Share Capital Audit Report	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018
23.	Disclosures under Code of Conduct for Regulating, Monitoring and Reporting of Trading by Designated Persons and their Immediate Relatives	Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
24.	Such other documents as may be required to be preserved for 8 years under the Act and SEBI regulations.	

C. DOCUMENTS WHOSE PRESERVATION PERIOD ARE NOT COVERED UNDER CLAUSE (A) AND (B) ABOVE:

The documents and records which are not covered under clause (A) and (B) above, shall be preserved/ maintained for a period as specified under the Act, SEBI regulations or any other applicable law.

Where no time period has been prescribed under the Act, SEBI regulations or any other applicable law for a document/record, the Head of the concerned Department will decide the time period for preservation for such document/record.

MODE OF PRESERVATION OF DOCUMENTS

The documents specified above may be kept in electronic mode subject to the applicable provisions of the law.

RESPONSIBILITY

It is the responsibility of the respective heads of all departments to assure the implementation of this Policy, in terms of managing the records and information of their respective department. This responsibility may be delegated to an assigned employee, not being below an employee who is second in line to the head of the department and would be responsible for developing the listing of records and their respective preservation schedules along with its regular updation.

A database of all archived materials should be stored at each department level. The records which are confidential in nature, should have selected access as may be determined by the Head of respective departments.

DESTRUCTION OF RECORDS

The documents/records which are no longer required after the statutory retention period should be reviewed and destroyed under instructions of the Head of the Department. The instruction for the destruction of the record must be provided in writing by the Head of the Department and a list of the documents destroyed shall be maintained.

LIMITATION AND AMENDMENT

In the event of any conflict between the provisions of this Policy and the LODR Regulations or of the Act, rules, or any other statutory enactments, the provisions of the LODR Regulations or the Act, rules, or statutory enactments shall prevail over this Policy. Any subsequent amendment / modification in the LODR Regulations, Act, rules and/or applicable laws in this regard shall automatically apply to this Policy.