

# **Archival Policy**

#### 1. Introduction

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires the Board of Directors of every listed company to frame a policy providing a framework for adequate protection and preservation of the company's documents as per applicable statutory requirements. Accordingly, the Board of Directors of the company has adopted this policy for the preservation of documents. The power to review and amend the policy rests with the Audit Committee and the Board of Directors of the company.

### 2. Definitions

- a. Act means the Companies Act, 2013.
- **b. Applicable Law** refers to any existing or new enactments, circulars, laws, rules, or regulations issued by the Government of India, State Government, or laws of overseas countries impacting the business of the company.
- **c. Authorised Person** includes any person authorised by the Board of Directors or the Audit Committee.
- d. Board refers to the Board of Directors of the company or any committees constituted by it.
- e. Company means Dudigital Global Limited.
- **f. Documents** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers, or any other record required under applicable law. Documents can be in paper or electronic form and do not include multiple or identical copies.
- **g. Electronic Records** as defined in clause (t) of Subsection 1 of Section 2 of the Information Technology Act, 2000.
- h. Electronic Form refers to any contemporaneous electronic device such as a computer, laptop, compact disc, electronic cloud storage, or other electronic storage and retrieval devices, whether in possession or control of the company.
- i. Maintenance means keeping documents in either electronic and/or physical form.
- **j. Preservation** refers to keeping documents in good order and preventing them from being altered, damaged, or destroyed.
- **k. Regulations** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## 3. Coverage

This policy is intended to guide the company and its employees on the maintenance, preservation, and disposal of documents.

# 4. Classification

The preservation of documents shall be carried out as follows:

# a. Documents with a statutory preservation period

Preserved for the period required under applicable law.

## b. Documents without a statutory preservation period

Preserved for a period as long as they pertain to matters deemed "current."

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### c. Other documents

Preserved for a period of five years from the date of origination unless deemed relevant for a longer period by a competent officer.

#### 5. Modes of Preservation

- **a.** Physical and/or Electronic Form Documents may be preserved in physical or electronic form.
- **b. Authorised Personnel** The authorised person responsible for preserving documents shall ensure compliance with applicable laws.
- c. Integrity and Accessibility Documents must be preserved to prevent tampering, alteration, or destruction. Accessibility should be controlled to ensure integrity and prohibit unauthorised access.

## 6. Custody of Documents

The custody of documents shall rest with the authorised person. If the authorised person resigns or is transferred, they must hand over all relevant documents, keys, access controls, and devices to a successor or other authorised personnel designated by the Board.

### 7. Archival of Documents

- **a. Storage Locations -** Documents shall be stored in secured locations earmarked by the company.
- b. External Archival Services External archival services may be utilised if appropriate.
- **c. Labelling and Record Maintenance -** Documents should be boxed, labelled with a reference number, and a list of contents maintained inside the box and by the relevant department.
- **d. Preservation Standards** Documents must remain complete, legible, and accessible to authorised personnel. They should be available to auditors or regulatory authorities upon request.
- **e. Record Maintenance -** The department head shall maintain a record of archived documents, including box reference numbers and storage locations.
- **f. Electronic Records -** Electronic records, such as emails and files, shall be archived as per the company's IT policy.

#### 8. Destruction of Documents

- **a. Approval for Destruction** Documents no longer required after the preservation period may be destroyed with prior approval from the Chairman & Managing Director. A record of destroyed documents shall be maintained.
- **b.** Compliance with Statutory Requirements If specific procedures are prescribed under applicable laws for document destruction, they shall be followed.
- **c. Suspension of Destruction -** Destruction of documents shall be suspended if they are subject to statutory notice, requisition, or litigation until the matter is resolved.

#### 9. Disclosure

In compliance with Regulation 46 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, this policy shall be disclosed on the company's website.

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