



**FirstMeridian Business Services Limited**

**PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY**

*(Approved and adopted by the Board on \_\_\_\_\_)*

**PART - A**  
**PRESERVATION OF DOCUMENTS**

**REGULATORY FRAMEWORK**

Regulation 9 of the Listing 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 preservation of which shall be permanent in nature; and
- b. Documents with preservation period of at least eight years after completion of the relevant transactions.

The details of documents for the above categories are given in the **Schedule I** to this policy.

**POLICY FOR PRESERVATION OF DOCUMENTS**

- A. 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 and the Listing Regulations and other applicable law, rules, regulations (collectively, called “Statutory Provisions”) and internal policies of the Company, in force.
- B. The relevant head of departments of the Company shall be responsible to ensure the maintenance and preservation of Documents and Records.
- C. Documents and Records which are required to be preserved by virtue of applicable laws and regulations shall be preserved either permanently or for such periods as may be mandated by applicable laws from time to time.
- D. Documents and Records which are required to be preserved for a period of not less than 8 (eight) years after completion of the relevant transactions (or such time period stipulated in the Listing Regulations and other laws and statutes applicable to the Company from time to time) shall be preserved for such stipulated time period as specified by the relevant head of departments of the Company from time to time.

**MODES OF PRESERVATION**

1. The Documents may be preserved either in physical form or electronic form.
2. The relevant head of departments of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person).
3. The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything 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 the authorized person for preservation, so as to ensure the integrity and confidentiality of the Documents and prohibit unauthorized access.
5. The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

#### **DISPOSAL OF DOCUMENTS AND RECORDS**

Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed or purged in one of the following ways without the prior written approval of any one of the key managerial personnel of the Company appointed under the Companies Act, 2013 or as procedure specified by law:

- A. Recycle non-confidential paper records;
- B. Shred or otherwise render unreadable confidential paper records; or
- C. Delete or destroy electronically stored data.

## **ARCHIVAL POLICY**

### **(Under regulation 30(8) of SEBI (Listing obligations and Disclosure Requirements) Regulations,2015)**

#### **PREFACE**

Content archiving is the process of collecting portions of the website and ensuring that the collection is preserved in an archive and maintain records required for statutory purposes.

In the present digital world, companies create and store electronic documents and information on their websites. The website is a single domain that consists of different web pages within the domain or sub-domains that convey information about the business carried out by the company.

FirstMeridian Website is hosted on the domain <https://firstmeridian.com>.

The Website provides reliable information to describe the business and the information hosted on the Website is updated on a regular basis depending on the requirements of the various businesses of the Company. Although web pages are frequently updated, the Company also archives certain types of documents and information to serve as a historical record for the Company.

Archived data consists of older data that is still important to the organization and may be needed for future reference, as well as documents/information that must be retained for regulatory compliance.

#### **SCOPE AND APPLICABILITY**

This Policy applies to such documents/information posted and visible to the public domain on the website of Company i.e. <https://firstmeridian.com>

#### **DATE OF IMPLEMENTATION**

The content archiving policy shall come into force from the date of listing. This policy has been issued with the approval of the Board and shall also be posted on the website of the Company.

#### **INFORMATION TO BE DISPLAYED ON THE WEBSITE:**

The information and documents as required under Regulation 46 of the SEBI LODR Regulations and other applicable Rules and Regulations, as amended from time to time, shall be displayed on the website of the Company. (Reproduced Regulation 46 of SEBI (LODR) Regulation, 2015 as **Schedule II**)

#### **DOCUMENTS/ INFORMATION WHICH SHALL BE ARCHIVED**

**Financial Data:** The Investor's web pages provide access to financial documents/information for existing and potential stakeholders which are regulatory in nature, including annual reports and financial results.

**Press Releases and News Announcements:** The Company's website provides information/ data which is relevant to the media, researchers or investors who seek information on the growth of the company and significant events of the past. This shall also include events or transactions or information which are disclosed by the Company to the Stock Exchanges in terms of Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under the SEBI LODR Regulations for a minimum period of five years.

#### **ARCHIVING MECHANISM**

The aforesaid information shall be displayed on the website of the Company for a period of five years from the date of its publication. The aforesaid information which is more than five (5) years old will be archived from the website of the Company and shall be maintained by the Company for a further period of three years using appropriate technology. These archives shall be made available on a written request made to the Compliance Officer of the Company.

#### **REVIEW & AMENDMENT**

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant regulation and remains effective. The Board has the right to change/amend the policy at any time at its discretion and the new policy shall be displayed to the stakeholders.

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## **SCHEDULE I**

### **Documents whose preservation shall be permanent in nature:**

1. Certificate of Incorporation /Certificate of Commencement of Business/ any other Registration Certificate/(s) issued by any other statutory authority (ies) etc.
2. Memorandum and Articles of Association and Rules, Bye-laws and Business Rules of the Company and the publication thereof in Official Gazette of India and the State Gazette.
3. Statutory Registers / Documents required under applicable laws
4. Audited financial statements of the Company
5. Annual Return(s) of the Company
6. Minutes of Board/General/Committee Meetings
7. Documents evidencing ownership of intellectual property rights
8. Order issued by any Courts/Statutory Bodies etc.
9. Correspondence with Regulators
10. Any other documents as may be required to be maintained and preserved permanently in accordance with applicable statutes, law(s), rules and regulations from time to time

### **Documents with preservation period of at least eight years after completion of the relevant transactions:**

- a) Books of Accounts including Ledgers, Journals, Cash book, Bank pass book, etc.
- b) Records of members showing their full names and addresses. Where any member is a firm, full names and addresses of all partners shall be shown.
- c) Records of authorized persons
- d) Notices of the Board Meeting, Committee Meeting and shareholders meeting, Postal Ballot Notices.
- e) Personnel Documents
- f) Insurance Policies/Claims
- g) All notices pertaining to Disclosure of interest of Directors/KMP's etc.
- h) Correspondence with Shareholders / Law Enforcing Agencies / Revenue Authorities etc.
- i) Non-Statutory Registers/Documents etc.
- j) Instrument creating a charge or modification thereof
- k) All business records and/or other records as may be decided by the Management from time to time
- l) Any other documents as may be specified by SEBI or as may be required to be maintained and preserved in accordance with the applicable statutes, law(s), rules and regulations from time to time.

**Regulation-46 of SEBI (LODR) Regulation, 2015**  
**Informations to be disseminated on the Website of the listed entity**

1. The listed entity shall maintain a functional website containing the basic information about the listed entity.
2. The listed entity shall disseminate the following information 229[under a separate section on its website:
  - (a) details of its business;
  - (b) terms and conditions of appointment of independent directors;
  - (c) composition of various committees of board of directors;
  - (d) code of conduct of board of directors and senior management personnel;
  - (e) details of establishment of vigil mechanism/ Whistle Blower policy;
  - (f) criteria of making payments to non-executive directors , if the same has not been disclosed in annual report;
  - (g) policy on dealing with related party transactions;
  - (h) policy for determining 'material' subsidiaries;
  - (i) details of familiarization programmes imparted to independent directors including the following details:-
    - (a) number of programmes attended by independent directors (during the year and on a cumulative basis till date),
    - (b) number of hours spent by independent directors in such programmes (during the year and on cumulative basis till date), and
    - (c) other relevant details
  - (j) the email address for grievance redressal and other relevant details;
  - (k) contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances;
  - (l) financial information including:
    - (a) notice of meeting of the board of directors where financial results shall be discussed;
    - (b) financial results, on conclusion of the meeting of the board of directors where the financial results were approved;
    - (c) complete copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report etc;
  - (m)shareholding pattern;
  - (n) details of agreements entered into with the media companies and/or their associates, etc;
  - (o) Schedule of analysts or institutional investors meet and presentations made by the listed entity to analysts or institutional investors.

**Explanation:** For the purpose of this clause 'meet' shall mean group meetings or group conference calls conducted physically or through digital means;

**(oa)** Audio or video recordings and transcripts of post earnings/quarterly calls, by whatever name called, conducted physically or through digital means, simultaneously with submission to the recognized stock exchange(s), in the following manner:

- (i)** the presentation and the audio/video recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier;
- (ii)** the transcripts of such calls shall be made available on the website within five working days of the conclusion of such calls:

Provided that—

- a.** The information under sub-clause (i) shall 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, as disclosed on its website.
- b.** The information under sub-clause (ii) shall be hosted on the website of the listed entity and preserved in accordance with clause (a) of regulation 9.

The requirement for disclosure(s) of audio/video recordings and transcript shall be voluntary with effect from April 01, 2021 and mandatory with effect from April 01, 2022;

- (p)** new name and the old name of the listed entity for a continuous period of one year, from the date of the last name change;
- (q)** items in sub-regulation (1) of regulation 47 .
- (r)** With effect from October 1, 2018, all credit ratings obtained by the entity for all its outstanding instruments, updated immediately as and when there is any revision in any of the ratings.
- (s)** separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year, uploaded at least 21 days prior to the date of the annual general meeting which has been called to inter alia consider accounts of that financial year:

Provided that a listed entity, which has a subsidiary incorporated outside India—

- i.** where such subsidiary is statutorily required to prepare consolidated financial statement under any law of the country of its incorporation, the requirement of this proviso shall be met if consolidated financial statement of such subsidiary is placed on the website of the listed entity;
  - ii.** where such subsidiary is not required to get its financial statement audited under any law of the country of its incorporation and which does not get such financial statement audited, the holding Indian listed entity may place such unaudited financial statement on its website and where such financial statement is in a language other than English, a translated copy of the financial statement in English shall also be placed on the website;
- (t)** secretarial compliance report as per sub-regulation (2) of regulation 24A of these regulations;



- (u)** disclosure of the policy for determination of materiality of events or information required under clause (ii), sub-regulation (4) of regulation 30 of these regulations;
  - (v)** disclosure of contact details of key managerial personnel who are authorized for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) as required under sub-regulation (5) of regulation 30 of these regulations;
  - (w)** disclosures under sub-regulation (8) of regulation 30 of these regulations;
  - (x)** statements of deviation(s) or variation(s) as specified in regulation 32 of these regulations;
  - (y)** dividend distribution policy by listed entities based on market capitalization as specified in sub-regulation (1) of regulation 43A;
  - (z)** annual return as provided under section 92 of the Companies Act, 2013 and the rules made thereunder.
- (3)**
- (a)** The listed entity shall ensure that the contents of the website are correct.
  - (b)** The listed entity shall update any change in the content of its website within two working days from the date of such change in content.
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