

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS IN THE WEBSITE

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

OBJECTIVE AND SCOPE

The objective of this document is to present a policy statement for Datiware Maritime Infra Limited regarding preservation of its documents and archival of documents in the website in accordance with the provisions of the Companies Act, 2013 and Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR").

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

DEFINITIONS

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| "Act" | Means the Companies Act, 2013. |
| "Applicable Law" | Means any law, rules, circulars, guidelines or standards binding on the Company, under which the preservation of the Documents has been prescribed. |
| "Authorised Person" | Means the functional head of the concerned department or any other person duly authorised by the Board or any of the Managing Director(s) of the Company. |
| "Board" | Means the Board of Directors of the Company. |
| "Company" | Means Datiware Maritime Infra Limited |
| "CCD" | Means the Chief of Concerned Department. |
| "Document(s)" | Refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record/s maintained by the Company, 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 / print form or in Electronic Form and does not include multiple or identical copies. |
| "Electronic Record(s)" | Means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000. |
| "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 access to it. |
| "Preservation" | Means to keep in good order and to prevent from being altered, damaged or destroyed, other than as permitted by this Policy. |

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:

- (A) Documents whose preservation shall be permanent in nature;
- (B) Documents whose preservation period shall not be less than eight years after completion of the relevant transactions;
- (C) Documents whose preservation shall be for a minimum period of three years after completion of the event.

The details of documents for the above three categories are given in the Annexure.

MODES OF PRESERVATION

The Documents may be preserved in:

Physical form or;

Electronic form

The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents, other than disposal of Documents as permitted under this Policy.

The preserved Documents must be accessible at all reasonable times.

Access shall be controlled by the authorised Persons, so as to ensure integrity of the Documents and prohibit unauthorized access

PERIODICAL REVIEW OF THE POLICY

The Chief Financial Officer of the Company is authorised to periodically review the policy and make such changes as considered necessary.

SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

STATUTORY REQUIREMENTS

If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

WEB ARCHIVAL POLICY

The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s).

Such disclosures shall be retained on the website of the Company for a minimum period of five years. At the end of the fifth year the information shall be archived and preserved for a further period of three years.

ANNEXURE A

Documents whose preservation shall be permanent in nature:

1. Accounting and Finance records including Annual Financial statements and Audit Reports
2. Investment records.
3. Tax records including annual returns
4. Property records including purchase and sale deeds, licenses, copyrights, patents & trademarks.
5. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records.
6. Personal files of individual employees.
7. Any other record as may be decided by the CCD from time to time.

Documents whose preservation period shall not be less than eight years after completion of the relevant transactions:

1. Books of Accounts, Bank Statements and vouchers
2. Filings with Stock Exchanges, Registrar of Companies and other statutory authorities.
3. Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc.
4. Corporate Social Responsibility Records
5. Sponsorship Projects Records
6. Correspondence and Internal Memoranda
7. Any other record as may be decided by the CCD from time to time.

Documents whose preservation shall be for a minimum period of three years after completion of the event:

1. Security Deposit Receipts
2. Tender Documents
3. Lease Deeds and Contracts
4. Legal files
5. Insurance Records including policies and claims.
6. All e-mail correspondence, internal & external.
7. Any other record as may be decided by the CCD from time to time.