HD FIRE PROTECT LIMITED

(Formerly known as HD Fire Protect Private Limited)

POLICY FOR PRESERVATION OF DOCUMENTS

(Approved by the Board of Directors on 19th June 2025)

1. Preamble:

The Securities and Exchange Board of India ("**SEBI**") has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**SEBI LODR Regulations**").

Regulation 9 of the SEBI LODR Regulations requires the Board of Directors of a listed entity to frame a Policy for Preservation of Documents ("**Policy**") classifying them into two categories:

i. Documents whose preservation shall be permanent in nature; and
ii. Documents to be preserved for not less than eight years after completion of the relevant transactions.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Accordingly, the Board of Directors of HD Fire Protect Limited ("**the Company**") has adopted this Policy for Preservation of Documents.

2. Applicability and Modes of Preservation:

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

3. **Definitions:**

a. "**Act**" means the Companies Act, 2013.

b. "**Applicable Law**" means any law, including the rules, circulars, guidelines or regulations issued by the SEBI, Ministry of Corporate Affairs, the Institute of Company Secretaries of India and other professional bodies, under which the preservation of documents has been prescribed.

c. "**Board**" means the Board of the Directors of the Company.

d. "**Books of Accounts**" includes records maintained in respect of –

i. all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place;

ii. All sales and purchases of goods and services by the Company;

iii. The assets and liabilities of the Company; and

iv. The items of cost as may be prescribed under section 148 of the Act in case the Company belongs to any class of companies specified under that section.

e. "**Company**" means HD Fire Protect Limited.

a. "**Documents**" refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, 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 or in Electronic Form, and includes without limitation documents such as emails or messages.

b. "**Electronic Form**" refers to data stored on any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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.

c. "**Maintenance**" means keeping Documents, either physically or in Electronic Form.

d. "**Preservation**" means to keep in good order and to prevent from being altered, damaged or destroyed.

e. **"SEBI LODR Regulations"** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

4. Roles & Responsibilities:

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of Documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

5. Authenticity:

Where a Document is being maintained both in physical form and Electronic Form, the authenticity with reference to the physical form should be considered for every purpose.

6. Destruction of Documents:

The documents specified in Annexure B which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads. Any deviation will be approved by the Chief Financial Officer.

7. Dissemination of the Policy:

This policy shall be continuously hosted on the website of the Company.

8. Compliance

The employees of the Company shall strictly comply with this Policy. Each Functional/ Departmental head of the Company shall lay down process for maintenance of Documents pertaining to the respective Function/ Department in compliance with this Policy. Failure to comply with this Policy may result in disciplinary action.

9. General:

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company from time to time.

10. Review of Policy:

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this Policy shall be approved by the Board

ANNEXURE A
Documents whose preservation shall be permanent in nature

Sr. No.	Nature of Document(s)
1.	Memorandum and Articles of Association
2.	Certificate of Incorporation
3.	Minutes Books of Board Meetings, General Meetings and Committees' Meetings
4.	Statutory Registers under applicable laws
5.	Listing Agreement executed with the stock exchanges
6.	Licenses and key approvals from the Statutory Authorities
7.	Annual Reports
8.	Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded
9.	All other documents which are required to be preserved by the company permanently in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars, and notifications etc. as may be applicable to the Company from time to time. All modifications, amendments, additions, deletions to the above documents shall also be preserved permanently by the Company.

ANNEXURE B
Documents with preservation period of not less than eight years after completion of the relevant transactions

Sr. No.	Nature of Document(s)
1.	Books of accounts and tax records viz. documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 (eight) years from end of the relevant assessment year or till the disposal of the appeal against any demand by the highest authority, whichever is later
2.	Attendance Registers, Notices, Scrutinizer's Report, Agenda, Notes to Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
3.	Disclosures of Interest received from Directors
4.	Copy of filings and returns that are not permanent in nature, under the provisions of the Companies Act 2013 / SEBI Regulations / other laws
5.	Employment / Personnel record in case of employees of the Company
6.	All Press Releases and publicly filed documents
7.	Legal Memoranda and Opinions
8.	All contracts shall be retained for a period of 8 (eight) Years after the expiry of the term of the contract unless such contract has been a subject matter of dispute in which case the contract and all other related communications/documents shall be preserved for a period of 8 (eight) years after such dispute has been finally adjudicated and the order / judgment cannot be superseded or has not been appealed against within the limitation period
9.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

****