



Policy on Preservation & Archival of Documents

Sl	Approving Authority	Date of Approval/Amendment
1	Board of Directors	17 th January, 2022
2	Board of Directors	25 th March, 2022



Delhivery Limited
Corporate Office: Plot 5, Sector 44, Gurugram - 122 002, Haryana, India
Registered Office: N24-N34, S24-S34, Air Cargo Logistics Centre-II,
Opposite Gate 6 Cargo Terminal, IGI Airport, New Delhi – 110037
(Formerly known as Delhivery Private Limited)

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1. Objective

1.1. The objective of this Policy is to lay down the principles for the preservation and archival of documents and records of the Company.

2. Regulatory Framework

2.1. The Securities and Exchange Board of India has on September 2, 2015 notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Regulations”) which shall come into effect on December 1, 2015.

2.2. Regulation 9 and Regulation 30(8) of the SEBI Regulations requires listed entities to have a Policy on Preservation and Archival of documents approved by its Board of Directors, classifying the documents in at-least two categories, which are as follows:

- a. Documents whose preservation shall be permanent in nature; and
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions.
- c Documents are archived and hosted on the Company’s website.

2.3. Accordingly, this policy is framed as per the requirements of the SEBI Regulations.

3. Definitions

3.1. “Archival” means accumulation/storage of historical records on server/network or at a physical place.

3.2. “Company” shall mean Delhivery Limited.

3.3. “Documents” or “Records” mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company.

3.4. “Preservation” or “preserve” means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.

3.5. “Policy” shall mean the Policy on Preservation & Archival of documents and records.

3.6. “SEBI Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued thereunder, including any statutory modifications or re-enactments thereof for the time being in force.

4. Policy

4.1. Preservation:

4.1.1. 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, the Listing Agreement and the SEBI Regulations and any all other applicable law, rules, regulations, internal policies of the Company, in force.

4.1.2. All the documents and records stated in Annexure A to this Policy shall be preserved permanently by the Company.

4.1.3. All the documents and records stated in Annexure B to this policy shall be preserved for not less than 8 years or such other longer period as may be prescribed under applicable laws/ rules/ regulations for the time being in force and thereafter the records can be destroyed.

4.1.4. The Company shall adhere to the applicable provisions of law/ rules/ regulations with regard to the manner of maintenance of records.

4.2. Archival

4.2.1 The Company shall ensure that all the relevant information, documents and events posted on the website of the Company in pursuance to Regulation 30 of the Listing Regulations shall be hosted on the Company's website for a period of 5 years or such other period as may be prescribed. Thereafter, all such information, documents and events will be retained on the website of the Company in the section entitled "*Archives*" for a minimum period of 1 year.

4.2.2. The document and records which are no longer current, but which are required to be preserved for a specified period of time or permanently under the applicable laws/ rules/ regulations shall be archived by the Company.

4.2.3. Every Function/Unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy.

4.2.4. Every Function/Unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.

4.2.5. The documents and records may be archived in physical and/or electronic mode and shall be stored in the premises of the Company or with any other approved place in case of physical documents and on the server of the Company and/ or the server of any third party vendor/ service provider in case of electronic documents having appropriate security and safety measures.

4.2.6. The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

4.2.7. Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed in one of the following ways:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.

5. General

5.1 The Policy would be subject to revision/ amendment in accordance with the applicable laws.

5.2 The Company reserves its rights to alter, modify, add, delete or amend any of the provisions of this policy.

5.3 In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

ANNEXURE – A

Indicative List

Records to be preserved permanently

SI. No.	Document/Record
1.	Certificate of Incorporation/ Commencement of Business
2.	Memorandum & Articles of Association
3.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
4.	Certificates obtained from various statutory authorities
5.	Affidavit from the subscribers to the memorandum and from persons named as the first directors
6.	Register of Members (MGT-1)
7.	Register of Renewed and Duplicate Share Certificate (SH-2)
8.	Annual Return
9.	The Foreign Register of Members
10.	Register of Charges (CHG-7)
11.	Register of particulars of loans and guarantee given, securities provided & acquisition of securities made by the Company (MBP-2)
12.	Books and Documents relating to the issue of share certificates, including the blank forms of share certificates
13.	Register of Investments not held in its own name by the Company (MBP-3)
14.	Register of Contracts with related party and contracts and Bodies etc. in which Directors are interested (MBP-4)
15.	Annual Audit Reports and Financial Statements
16.	Subsidiary Accounts
17.	Internal/ Cost Audit Reports
18.	Compliance / Secretarial Audit Reports
19.	Tax Exemption and Related documents
20.	Tax Bills, receipts and payments
21.	Court Orders
22.	Business/ JV/ SPA/ SHA/ SSA/ Loan/ Lease Agreements
23.	Trade Mark/ Copyrights/ Patents
24.	Original Purchase and Sale Agreement
25.	Property Card, Index, Ownership records issued by Government Authority
26.	Property Insurance
27.	Project Documents and related correspondence (including any proposal of the Project and its approval)
28.	Those pertaining to non-routine matters or having significant lasting consequences
29.	All Insurance Policies
30.	Payroll Registers
31.	Bonus, Gratuity and other Statutory Records
32.	License/ Approvals

ANNEXURE – B

Records to be preserved for minimum period of eight years

Sl. No.	Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities) (MGT-2)
3.	Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)
4.	Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)
5.	Books of Account together with relevant vouchers (Not less than 8 financial year)
6.	All notices pertaining to disclosure of interest of directors (MBP-1) for a period of 8 years from the end of the financial year to which it relates)
7.	All certificates surrendered to a company (8 years from date of surrender)
8.	Register of deposits (not less than 8 years from the date of last entry)
9.	Instrument creating a charge or modification (8 years from date of satisfaction of charge)
10.	The postal ballot and all other papers relating to postal ballot including voting by electronic means (as long as they remain current or for 8 financial years, whichever is later).
11.	Annual Plans & Budget (8 years)
12.	Bank Statements (8 years)
13.	Investment Records (8 years)
14.	RBI Returns (8 years)
15.	Foreign Trade Documents (8 years)
16.	General Correspondence (8 years)
17.	Correspondence with stock exchanges
18.	Excise/ Customs Records (8 years from the end of the FY or completion of assessment under the applicable law is over, whichever is later)
19.	Tax Deducted at Source Records (8 years from the end of the FY or completion of assessment under the applicable law is over, whichever is later)
20.	Income Tax papers (8 years from the end of the FY or completion of assessment under Income Tax, whichever is later)
21.	Service Tax/ GST papers (8 years from the end of the FY or completion of assessment under Service Tax/ GST, whichever is later)
22.	VAT/ CST/ State Sales Tax (8 years from the end of the FY or completion of relevant assessment whichever is later)
23.	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation) (8 years after termination or expiration of tenure / contracts)

24.	Legal Memoranda and Opinions including subject matters files (8 years after the closure of the matter)
25.	Litigation files (8 years after the close of the Litigations)
26.	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. <ul style="list-style-type: none"> • Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for meetings; • Letters of general enquiry and replies that complete the cycle of correspondence (8 years)
27.	Statutory/ Registers (8 years)
28.	Audit documents (8 years)

In addition to the above, all Documents and Records of the Company, which are not specifically referred to or covered in this Policy, shall be preserved for such time period and shall be maintained in such manner ascribed under the applicable law.