

Policy on Preservation of Documents

PREFACE

This Policy is prepared in accordance with the provisions of the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”). This policy represents the policy of Pitti Laminations Limited with respect to the preservation/retention and destruction of documents and other records, both in hard copy and electronic media and archival of documents in its website (<http://pitti.in/>).

Purpose & Scope

The purpose of this policy is to present a high level policy statement for its organisation regarding preservation of its documents.

The policy is intended to define preservation of documents responsibilities and to provide guidance to the executives and staff working in the organisation in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frames the guidelines for fundamental accountability of the Organisation to retain and preserve its documents as the basis for communication with a range of external stakeholders.

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 would contain 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

Pitti Engineering Limited

[Formerly Pitti Laminations Limited]



needed and how the documents should be accessed and retrieved when they are needed.

OBJECTIVE

The objective of this policy is to ensure compliance with Regulation 30 (8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as mentioned below:

The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures 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.

ARCHIVAL POLICY

In compliance with the aforesaid regulation, the Company will ensure that all the 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 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.

RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's

Pitti Engineering Limited

[Formerly Pitti Laminations Limited]



employees would immensely help company's litigation preparedness tool helping the Company's and Outside legal counsel to track down documents to handle the legal cases.

EMERGENCY PLANNING

Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the organization in the case of an emergency shall be regularly duplicated or backed up and maintained in an off-site location. The Administrator shall develop reasonable procedures for document retention in the case of an emergency.

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 Executive Management Committee has the right to change/amend the policy at any time at its discretion and the new policy shall be displayed to the stakeholders.