



**POLICY
ON
PRESERVATION OF DOCUMENTS
AND
ARCHIVAL OF DOCUMENTS ON WEBSITE
OF
SIFY INFINIT SPACES LIMITED
(effective from 22nd October 2024)**

The Policies listed above, to the extent they are applicable to an un-listed public company, shall become applicable from the date of its approval by the Board. Post listing of the equity shares of the Company with the Stock Exchange(s), the policies would become fully applicable to the Company.

INDEX

S. NO.	PARTICULARS	PAGE NO
1.	Introduction	3
2.	Objective and Purpose	3
3.	Definitions	4
4.	Interpretation	4
5.	Value of Records	4-5
6.	Authority and responsibility	5
7.	Preservation of Documents	5-6
8.	Maintenance and storage facility	6
9.	Disposal of records	6
10.	Archival Policy	6-7
11.	Location of records	7
12.	Access and authenticity	7
13.	Record retention schedule	7
14.	Record appraisal	7
15.	Risk-based approach	7-8
16.	Exclusions	8
17.	Modifications and review of the policy	8
18.	Breach of policy	8
19.	Annexure I	9-10
20.	Annexure II	11-14
21.	Annexure III	15

1. INTRODUCTION

This policy on Preservation of Documents and Archival ("Policy") is prepared and adopted to effectively manage the records of M/s. Sify Infinit Spaces Limited ("SISL/ the Company") and is obliged to create, maintain, preserve and dispose of such records in accordance with the requirement of Regulation 9 and Regulation 30 (8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations') and the Companies Act, 2013. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of the Companies Act, 2013.

The corporate records of the Company are important assets for the Company and hence the Company seeks to access and manage its records effectively and is obliged to create, maintain, preserve and dispose of records as per Policy.

This Policy categorizes the records that whose preservation shall be permanent in nature and documents that will be preserved for specified period of time and outlines responsibilities to create, maintain and lawfully dispose of the records. It endorses the preservation of records in the Company's Archives.

2. OBJECTIVE AND PURPOSE

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

- To identify statutory records to be preserved.
- To identify records to be maintained either for a period of eight (8) years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form.
- To help employees understanding their obligations in retaining and preserving the documents and records.
- Effective corporate governance and risk management;
- Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- Systematic disposal/destruction of Company's non-current records that have outlived their administrative usefulness;
- Identification of the Company's records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company's Archives.

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:

- (a) Documents whose preservation shall be permanent in nature
- (b) Documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode. Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company. Besides the above, as per applicable provisions of Companies Act, 2013 certain documents are required to be preserved permanently or upto a certain prescribed time. Accordingly this policy is being framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

3. DEFINITIONS

"**Act**" means the Companies Act, 2013 and Rules framed there under, as amended from time to time.

The "**Board**" or "**Board of Directors**" means, meeting of the Directors duly called and constituted or as the case may be

The "**Company**" or "**The Company**" means "**Sify Infinit Spaces Limited**", a Public Limited Company, incorporated under the provisions of the Companies Act, 2013.

"**Directors**" means a director appointed to the Board of a company.

"**Compliance Officer**" means the Company Secretary of the Company.

"**Documents**" means a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company including documents as defined in sub-section 36 of section 2 of the Companies Act, 2013.

"**Electronic Records**" means as defined in Information Technology Act, 2000 or as amended from time to time.

"**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 and as defined in Information Technology Act, 2000 or as amended from time to time.

"**Maintenance**" means keeping documents, either physically or in electronic form.

"**Preservation**" 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.

"**Policy**" means this Policy of Preservation of Documents of the Company and archival of records.

"**Records**" in relation to this policy includes accounting records, books or papers and books and papers as defined in clause 12 of section 2, books of accounts as defined in clause 13 of section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not.

"**Register**" means a register maintained under the Companies Act, 2013 or the SEBI Regulations.

Unless the context otherwise requires, words and expressions used in this policy and not defined herein but defined in the Companies Act, 2013 as may be amended from time to time shall have the meaning respectively assigned to them therein.

4. INTERPRETATION

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

5. VALUE OF RECORDS

The Company understands the value of its records. Thus, attached to this Policy are the combinations of qualities that relate to their importance, usefulness or quality. The following values are offered by the records:

- Informational value - All information presented, whether written, pictorial or audio.
- Material value - Intrinsic information about the records that can be retrieved from the material itself, such as age, provenance, history, software.
- Cultural value - Encompasses a range of values such as political, religious, historical, ethical, aesthetic, and many other similar values.

As per this Policy, the Company shall preserve the qualities of all records as far as possible.

6. AUTHORITY AND RESPONSIBILITY

The Whole Time Director, Chief Financial Officer, Business Heads and the Company Secretary & Compliance Officer, as designated by the Board of the Company in this behalf, shall be responsible for the preservation of the records according to the time frame prescribed in the Policy for their preservation.

All staff and management of the company shall assist in implementing this Preservation Policy as appropriate to their roles and responsibilities.

7. PRESERVATION OF DOCUMENTS

This Policy sets the standards for preservation of documents of the Company, broadly classified in the following categories, which may be preserved, in physical and/or electronic mode.

Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	
Category A – Documents to be preserved permanently in nature	
This Policy contains the details of documents whose preservation shall be permanent in nature. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company	Annexure 1
Category B – Documents to be preserved for not less than eight years after completion of the relevant transaction	
this Policy contains the details of documents with preservation period of not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years	Annexure 2
Category C – General	
In addition to the documents mentioned in the above category, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing rules/ procedures/ practices of the Company or as per the applicable statutory/ regulatory provisions in this regard.	Annexure 3

Documents to be made available on the website of the company as required by the Companies Act, 2013 and the SEBI Listing Regulations	
The Company shall maintain a functional website containing:	
<ul style="list-style-type: none"> • The basic information about the Company • All information and/or documents as specified in the applicable provisions of Companies Act, 2013 • All information and/or documents as specified in Regulation 46 (2) of the SEBI Listing Regulations • All information and/or documents mentioned in Part (B) of Annexure 2 of this Policy, which are required to be made available on the website of the Company • All information and/or documents as mentioned in Regulation 30 of the SEBI Listing Regulations on material events. 	
The Company shall ensure that contents of the website are correct.	

The Company shall update any change in the content of its website within two working days from the date of such change in content.

Information and/ or documents required to be made available under Regulation 30 of the SEBI Listing Regulations shall be made available on the website simultaneously with disclosure to stock exchanges.

The information and/or documents relating to all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of company for a minimum period of five years.

Information and/ or documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz. The information and/or documents shall be arranged financial year wise with further segregation into four quarters of the financial year

All policies etc. or the information/ documents of a general nature can be clubbed together at one place.

8. MAINTENANCE AND STORAGE FACILITY

Documents shall be maintained/ preserved in the following manner:

- Documents maintained in physical form:
 - (a) All information and/ or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
 - (b) All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.
- Documents maintained in electronic form:
 - (a) All documents pertaining to current financial year and for one preceding financial year shall be maintained on server and timely Backup be maintained periodically. The documents shall be maintained in such a manner that their retrieval is easy and quick.
 - (b) Back up of all documents pertaining to the period prior to one preceding financial year shall also be maintained on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

9. DISPOSAL OF RECORDS

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

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

10. ARCHIVAL POLICY

The Company shall disclose on its website all such information as prescribed by the Companies Act, 2013, Listing Regulations and any other applicable law. The Company shall also disclose on its website all such events or information which has been disclosed to stock exchange(s) under Regulation 30(8) of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a minimum period of five (5) years and thereafter the same shall be archived.

- 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.
- The documents and records may be archived in physical and/or electronic mode as the Board of Directors of the Company may deem fit.
- The documents and records archived in electronic form shall be backed up automatically on a periodic basis.
- Documents and records which are no longer required to be preserved as per the provisions of this Policy may be destroyed in such manner as prescribed by the Company's Board of Directors.

11. LOCATION OF RECORDS

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute shall be maintained at the corporate office of the Company or at any other place as may be approved by the Board, from time to time.

12. ACCESS AND AUTHENTICITY

The preservation of the records of the Company is vital in order to ensure all current and future access to the records. Preservation is also concerned with ensuring the authenticity of records.

Since, the records are maintained at different levels and departments in the Company, therefore Functional Heads should be authorized to ensure the preservation and access to the Records under their jurisdiction.

13. RECORD RETENTION SCHEDULE

The records shall be maintained permanently and the records which are required to be preserved permanently on the website of the Company shall be preserved in line with this Policy of the Company.

The records shall be preserved for at least eight (8) years and thereafter as per the discretion of the Board records may be disposed of in the manner prescribed by it.

The Company shall maintain a register of preservation and disposal of records in the custody of the Compliance officer of the Company, wherein the brief particulars of the records preserved and/or removed from the location after the expiry of its preservation period shall be entered.

The register of preservation and disposal of records shall contain the following columns:

- (a) Item Number;
- (b) Brief Particulars of the records preserved/disposed of;
- (c) Date of creation of the record;
- (d) Date of removal from the register;
- (e) Whether preserved permanently or not; and
- (f) Mode of destruction

This register of preservation and disposal of records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or electronic form.

14. RECORD APPRAISAL

The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process is to ensure the records are examined at the appropriate time to determine whether or not they are worthy of archival preservation, whether they need to be retained for a longer period as they are still in use, or whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the Board of the Company.

15. RISK-BASED APPROACH

The Company adopts a risk-based approach in an endeavour to preserve the collection of its records. A preservation risk assessment for the whole collection shall be conducted and subsequently shall be reviewed periodically. The result of the risk assessment would be used to determine the urgency of preservation action, a low risk may simply indicate that the risk assessment should be re-calculated at a future date, whereas a high risk will trigger immediate action.

16. EXCLUSIONS

Any document or record created in the routine course of working and which is not required to be maintained in terms of applicable rules and regulations will not be governed by this Policy. Further, the Policy does not apply to personal or non-business information.

17. MODIFICATIONS & REVIEW OF THE POLICY

The Board of Directors of the Company ("Board") may subject to applicable laws is entitled to amend, suspend or rescind this Policy at any time. Any difficulties or ambiguities in the Policy will be resolved by the Board of Directors in line with the broad intent of the Policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy.

In the event of any conflict between the provisions of this Policy and of the applicable law dealing with the related party transactions, such applicable law in force from time to time shall prevail over this Policy

The Board shall have power to amend/modify any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

If there is any inconsistency between the terms of the Policy and the Listing Regulations, the provisions of the Listing Regulations shall prevail. Any amendments to the Listing Regulations shall mutatis mutandis be deemed to have been incorporated in this Policy.

18. BREACH OF POLICY

Failure to retain documents or records in appropriate form and manner could expose the Company and its officers to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation. Any person guilty of breaching any of the provisions of the Policy will be subject to such disciplinary action, as may be decided by the Company which may lead to wage freeze, suspension or termination from services of the Company. The disciplinary action taken by the Company will be in addition to any other penalty or re-course as may be prescribed under applicable statute(s) governing such matter or breach.

ANNEXURE- I

PRESERVATION OF DOCUMENTS - PERMANENT IN NATURE

S. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1.	Copies of all documents and information as originally filed under section 7(1) (incorporation) till dissolution under the Companies Act, 2013	Registered office		Sec 7(4) of the Companies Act, 2013	Permanent, till dissolution of the Company
2.	Register of Renewed and Duplicate Share Certificates	Registered office of the Company or at such other place where the Register of Members is kept	Company Secretary or any other person authorized by the Board for the purpose	Rule 6 (3) of Companies (Share Capital and Debenture) Rules, 2014	Permanent
3.	Share certificate forms and related books and documents – Disputed Cases	Registered office of the Company or at such other place where the Register of Members is kept	Company Secretary or any other person authorized by the Board for the purpose	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	Permanent
4.	Register of Charges	Registered office	Company Secretary	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	Permanent
5.	Register of Members along with the index	Registered office of the Company or at such other place where the Register of Members is kept	Company Secretary or any other person authorized by the Board for the purpose	Rule 15(1) of the Companies (Management and Administration) Rules, 2014	Permanent
6.	Foreign Register of Members, if any	Registered office of the company or at such other place where the said documents are kept	Company Secretary or person authorised by the Board	Rule 15 (4) of the Companies (Management and Administration) Rules, 2014	Preserved permanently, unless it is discontinued and all the entries are transferred to any other foreign register or to the principal register
7.	Minutes of proceedings of general meeting and	Registered Office or at	Company Secretary	Rule 25(1)(d) &	Permanent

	meeting of Board of Directors, creditors, committees of the Board and resolutions passed by Circulation.	such other place as may be approved by the Board.		(e) of the Companies (Management and Administration) Rules, 2014 and Secretarial Standards 1& 2 – clause 8.1& 18.1	
8.	Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities)	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 12(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
9.	Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person)	Registered Office	Company Secretary	Rule 14(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
10.	Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)	Registered Office	Company Secretary or any other person authorised by the Board for the purpose	Rule 16(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
11.	Minutes of all the general, Board & Committee Meetings of the transferor Company as handed over to the transferee company.	Registered Office or at such other place as may be approved by the Board.	Company Secretary	8.1& 18.1 (Secretarial Standards-1 & 2)	Permanent

Note: The Company may maintain Registers/records though Registrar and Transfer Agent wherever it is applicable & allowed under applicable laws.

ANNEXURE – II

**PRESERVATION OF DOCUMENTS - PERIOD OF NOT LESS THAN EIGHT YEARS AFTER
COMPLETION OF THE RELEVANT TRANSACTIONS**

A) Mandated under Companies Act, 2013

S. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1.	Register of Deposits accepted or renewed	Registered Office		Rule 14(3) of The Companies (Acceptance of Deposits) Rules, 2014	Not less than 8 years from the financial year in which the latest entry is made in the register
2.	Instrument creating charge or modification thereon	Registered Office		Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	8 years from the date of satisfaction of charge by the company
3.	Register of debenture holders or any other security holders along with the index	Registered Office or at such other place as may be approved by the Board.	Company Secretary or any other person authorized by the Board for such purpose	Rule 15 (2) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of debentures or securities
4.	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto	Registered Office or at such other place as may be approved by the Board.		Rule 15 (3) of the Companies (Management and Administration) Rules, 2014	8 years from the date of filing with the Registrar of Companies.
5.	Foreign register of debenture holders or any other security holders	Registered Office or at such other place as may be approved by the Board.	Company Secretary or person authorised by the Board	Rule 15 (4) &(5) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of such debentures or securities.
6.	All notices for disclosure of concern/ interest received u/s 184 of the Companies Act, 2013	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	8 years from the end of the financial year to which it relates
7.	Attendance register of Board & Committee Meetings	Registered Office or at such other place as may be approved by the Board.	Company Secretary	4.1.7 of Secretarial standards -1	8 financial years

8.	Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the company as well as for transferor Company (as handed over to the transferee company)	Registered Office or at such other place as may be approved by the Board.		8.2 of Secretarial Standards-1	As long as they remain current or for 8 financial years whichever is later
9.	Office copies of general meeting Notices, scrutinizers report and other related papers of the company as well as for transferor Company (as handed over to the transferee company)	Registered Office or at such other place as may be approved by the Board.		18.2 (Secretarial Standards-2)	As long as they remain current or for 8 financial years whichever is later
10.	Books of Accounts	Registered Office or at such other place as may be approved by the Board.			8 financial years

Note: The Company may maintain Registers/records through Registrar and Transfer Agent wherever it is applicable & allowed under applicable laws.

B) Illustrative list of Documents identified under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 apart from Documents mentioned in Annexure 1 & Annexure 2 (PartA)

S. No.	Document	Provision	Reference of provision	Period
1.	Compliance certificate (for compliance of Reg. 7(2) signed by compliance officer & share transfer agent)	within thirty days from the end of each half year	7(3)	8 years
2.	Statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.	within twenty one days from the end of each quarter	13(3)	8 years
3.	Quarterly compliance report on corporate Governance	within twenty one days from close of the quarter.	27(2)	8 years
4.	Prior intimation to stock exchange about the meeting of the board of directors	Within the time prescribed	29	8 years
5.	Disclosures of any material events or information	Within the time prescribed	30	8 years
6.	Statement showing holding of securities and shareholding pattern separately for each class of securities	on a quarterly basis, within 21 days from the end of each quarter	31	8 years
7.	Statement of deviation(s) or variation(s) in the use of proceeds from the objects stated in the offer document or explanatory statement to the notice for the general meeting, for public issue, rights issue, preferential issue etc.	Within the prescribed time on a quarterly basis	32	8 years
8.	Quarterly and year-to-date standalone/ consolidated financial results	Within forty five days from the close of quarter, other than last quarter	33(3)(a)	8 years
9.	Annual Audited standalone/ consolidated financial results along with the results of the last quarter	Within sixty days from the end of financial year	33(3)(d)	8 years
10.	As part of financial results for the half year by way of a note a statement of assets and liabilities as at the end of the half-year	along with quarterly Financial Results	33(3)(f)	8 years
11.	Annual report	not later than the day of commencement of dispatch to its shareholders	34	8 years
12.	Annual Information Memorandum	in the manner specified by the Board from time to time	35	8 years
13.	a certificate from a practicing company secretary, certifying that all certificates have been issued within thirty days of the	within thirty days month of the end of financial year	40(9)	8 years

	date of lodgement for transfer, subdivision, consolidation, renewal, exchange or endorsement of calls/allotment monies.			
14.	Intimation of record date	Notice in advance of at least seven (3 working days in case of right issue) working days (excluding the date of intimation and the record date) to stock exchange	42	8 years
15.	Details regarding the voting results of general meetings	within two working days of conclusion of its General Meeting	44	8 years
16.	Any and all kinds of filing to Stock Exchanges, viz. Press Release, Investors Presentation, etc.	Within the time prescribed		8 years

*However the disclosures under Regulation 30 shall be hosted on the website for a minimum period of five years.

ANNEXURE – III

PRESERVATION OF DOCUMENTS

S. No.	Document	Person responsible for custody	Reference of provision	Period
1.	Share certificate related books and documents (other than disputed cases)	Company Secretary	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	30 years
2.	Share certificates surrendered to company immediately be defaced by stamping or printing the word "cancelled" in bold letter)	Company Secretary	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	3 years from the date on which they were surrendered

Note: The Company may maintain Registers/records though Registrar and Transfer Agent wherever it is applicable & allowed under applicable laws