CARNATION INDUSTRIES LIMITED

POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

1. LEGAL RAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents. The Board of Directors of Carnation Industries Limited ("the Company") is required to formulate a policy for "Preservation of Documents JU" and "Archival of Documents" to comply with the requirements of Regulation 9 of the Listing Regulations.

EFFECTIVE DATE This Policy is effective May 29, 2025.

DEFINITIONS

A. **"Board of Directors**" or "Board" Board of Directors or Board shall mean the Board of Directors of Carnation Industries Limited, as constituted from time to time.

B. "**Company**" Company shall mean "Carnation Industries Limited".

C. "**Documents**" Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

D. "**Listing Regulations**" Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

2. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

A. The documents of a permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure-2) shall be preserved by the Company for the term not less than eight years (8 Years) after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also

be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy. The documents shall be preserved both in electronic and physical form.

5. 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.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the Board of Directors where such approval is statutorily required or by the respective the department head(s) in all other cases. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies.

8. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

9. ARCHIVAL OF DOCUMENTS

Documents mentioned in the annexed Documents Preservation Schedule which are not required regularly can be archived by the concerned department in the following manner:

1. Documents to be archived should be kept in the storage locations earmarked by the Company for the purpose in secured place or cupboard having access only by the authorized personnel.

2. Documents should be stored in a way that preserves their integrity and readability and restricts access to authorized personnel only;

3. The medium used to store documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available to the Auditors or Regulatory Authorities upon request;

4. Electronic records i.e. e-mails, files etc. should be archived as per IT Policy/Practices of the Company.

Annexure-1

Documents whose preservation shall be permanent in nature

01 Registration Certificates

02 Licenses & Statutory Approvals

03 Statutory Registers required under applicable laws

04 Audited financial statements

05 Minutes of General Meeting

06 Minutes of Board Meeting

07 Minutes of various Committee Meetings

08 Material Agreements/Contracts

09 Orders issued by Courts/Statutory bodies

10 Investment Documents/proofs including certificates etc.

11 Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure 2

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

01 Books of Accounts

02 Annual Return(s)

03 Notice of the Board and Committee Meetings, Proof of dispatch and delivery

04 Agenda, notes and related documents for Board and Committee Meetings

05 Correspondences with Departments/shareholders

06 Non-Statutory Registers/Documents

07 Films, Videos, CDs, DVDs, tapes etc.

08 Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.