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## ***ARCHIVAL POLICY***

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## PURPOSE

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, (hereinafter referred to as “SEBI LODR”) and Companies Act, 2013. SEBI has mandated all the listed entities to have a policy on Preservation and Archival of Documents. Archival Policy as referred to in Regulation 30 (8) of the SEBI LODR forms part of this Policy. This policy is intended to ensure compliance particularly with the SEBI LODR and the applicable provisions of Companies Act, 2013.

## ARCHIVAL REQUIREMENT

The purpose of this documents to present a high level policy statement for **Kwick Forensic Solutions Limited** (“the Company”) (Formerly Kwick Forensic Solutions Private Limited), (Formerly Kwick Integrated Forensic And Investigation Solutions Private Limited), (Formerly Kwick Soft Solutions Private Limited) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 (“the Act”), SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Regulation”) and any other applicable laws to the Company.

Considering the requirements as prescribed under SEBI LODR, the Board of Directors of **Kwick Forensic Solutions Limited** (“the Company”) has formulated this policy known as Kwick Forensic Solutions Limited - Archival Policy.

## MODE OF PRESERVATION & RESPONSIBILITY

The Authorised Person i.e. the Company Secreatry or the Chief Financial Officer or both shall:

- a. Preserve the Documents either in physical form or electronic form;
- b. Preserve the Documents in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents;
- c. Ensure that the preserved Documents are accessible at all reasonable times;
- d. Control access for preserved Documents, to ensure integrity and confidentiality of the documents and prohibit unauthorised access;

## DESTRUCTION OF DOCUMENTS

After the expiry of the retention period, the Authorised Person may destroy the preserved Documents in such a mode as deemed fit. The Compliance Officer of the Company shall approve the destruction of such Documents.

The Authorised Person shall maintain a register of disposal of records, with details of Documents destroyed in the format prescribed in the guidance manual. This applies to both physical and electronic Document.

## ARCHIVAL POLICY

a. The Company will host all the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI LODR on the website of the Company under the section entitled [“Investors”] the documents whose preservation shall be permanent in nature and documents which shall be preserved for a period not less than eight years as mentioned in Annexure 1 and Annexure 2 respectively.

b. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Compliance Officer of the Company.

c. This Policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.

## INTERPRETATION

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy.

## AMENDMENT

Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. Any subsequent amendment/modification in the Act or the rules framed thereunder or the SEBI LODR and/or any other laws in this regard shall automatically apply to this Policy.

*Shamir S. Shah*



## Annexure -1

### Documents whose preservation shall be permanent in nature

1. Incorporation documents
2. Memorandum and articles of association
3. Register of members along with the index
4. Register of sweat equity shares
5. Register of directors and key managerial personnel
6. Register of renewed and duplicate share certificates
7. Register of employee stock option
8. Register and index of beneficial owners
9. Register of shares or other securities that have been bought back
10. Share certificate forms and related books and documents – disputed cases
11. Register of charges
12. Register of loans, guarantees, security and acquisition
13. Register of investments made by the Company not held in its name
14. Register of contracts or arrangements in which directors are interested
15. Foreign register of members
16. Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board of Directors, creditors, committees of the Board of Directors and resolutions passed by circulation
17. Register of transfer and transmission of shares
18. Statutory Clearances, Annual Returns, Assessment Orders, Loan Documents, Security Documents, Guarantee Documents, Investment Documents, Management Consultancy Agreements, Stock Exchange Listing Permissions etc.
19. Forms and returns filed with the Registrar of Companies, Ministry of Corporate Affairs, SEBI or any other regulatory authority.
20. Any court/ NCLT orders, agreements and notices.

21. Certificates issued by the Registrar of Companies.

22. Other statutory registers and documents maintained by the Company under various laws applicable to the Company or as prescribed by the Board of Directors from time to time.

23. Any other documents as may be required to be maintained permanently under various laws applicable to the Company.

## **Annexure -2**

### **Documents with preservation period of not less than eight years after completion of relevant transaction**

1. Books of account including relevant books and papers and financial statements
2. Disclosures/ notices by a director of his interest
3. Register of deposits
4. Instrument creating a charge or modification
5. Annual return and copies of all certificates and documents required to be annexed thereto
6. Register of debenture holders
7. Postal ballot forms
8. Attendance Register of Board & Committee Meetings
9. Office copies of Notices, Agenda, Scrutinizer Report, Notes on Agenda and other related papers
10. Correspondence with shareholders
11. Tax records
12. Disclosures – SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
13. Disclosures – SEBI (Prohibition of Insider Trading) Regulations, 2015
14. Protected Disclosures in writing or documented along with the results of investigation relating thereto (including the Investigation Report) as reported under the whistle-blower policy
15. Other statutory registers and documents maintained by the Company under various laws applicable to the Company or as prescribed by the Board of Directors from time to time.
16. Records of securities dematerialised and rematerialised
17. The names of the transferor, transferee, and the dates of transfer of securities
18. A register and an index of beneficial owners
19. Details of the holding of the securities of beneficial owners as at the end of each day
20. Records of instructions received from and sent to participants, issuers, issuers' agents and beneficial owners

21. Records of approval, notice, entry and cancellation of pledge or hypothecation, as the case may be.

22. Details of participants

23. Details of securities declared to be eligible for dematerialisation in the depository

24. Such other records as may be specified by the Board of Directors for carrying on the activities as a depository

25. Any other documents as may be required to be maintained under various laws applicable to the Company for the periods stipulated.