EAAA INDIA ALTERNATIVES LIMITED

(Formerly known as Edelweiss Alternative Asset Advisors Limited)

POLICY FOR PRESERVATION OF DOCUMENTS

Title	POLICY FOR PRESERVATION OF DOCUMENTS
Release Date	December 04, 2024
Version No.	1.0
Revision/Review Date	[January 12, 2026~~New Policy~~]
Policy Owner	Compliance Team

Preamble:

Pursuant to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**") the Board of Directors ("**Board**") of EAAA India Alternatives Limited ("**Company**")are required to frame a Policy for Preservation of Documents ("**Policy**") classifying them in to two categories

-Documents whose preservation shall be permanent, and

-Documents to be preserved for not less than eight years

The Documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that documents whether in physical or electronic mode, forms an important and integral part of the Company's records ("**Documents**"). The preservation of Documents is important in order to ensure immediate access to the records, its retrieval and authentication.

2. Applicability:

This Policy is applicable to all Documents maintained in physical and electronic mode by the Company.

The Documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

3. Documents:

For the purpose of this Policy the term "**Documents**" shall mean statutory records, registers, returns, forms etc. required to be maintained and preserved by the Company in physical or electronic form under the Companies Act, 1956/Companies Act, 2013, Securities and Exchange Board of India Act, 1992, Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1996.

4. Documents to be preserved permanently:

A. Companies Act, 2013:

-The original signed and stamped Memorandum and Articles of Association as amended from time to time.
-Register of contracts;
-Register of Directors and key managerial personnel and the securities held by them;
-Register of loans and investments made by the Company;
-Register and index of members;

-Minutes of the Board, committees of the Board and general body meetings including meeting conducted through postal ballots;
-Resolutions passed by circulation;
-Various forms and returns filed with the authorities; and
-Audited Financial Statements.

B. SEBI (Portfolio Managers) Regulations:

-Certificate of Registration issued by SEBI.

C. SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

-Listing Agreement executed with the Stock Exchanges in India;

-Trading approval relating to listing of securities;

-Offer documents for public issues and private placement of securities filed with Securities and Exchange Board of India.

D. Depositories Act:

-Confirmation of all corporate actions in respect of allotment of securities; and

-Intimation on allotment of International Securities Identification Numbers (ISIN) for securities issued.

E. Others:

Register of Records and Documents destroyed.

5. Following documents shall be preserved and maintained for a period of 8 years from the date of its event, unless specified under any other any Act or rules, for a longer duration:

A. Companies Act 1956/Companies Act, 2013:

-Register of Buy-back of Securities from the date of completion of buy-back

-Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots.

-Register of Charges from the date of satisfaction of respective charge.

-Register of Debentures and Debenture Trust Deed from the date of its redemption. Books of Accounts including vouchers and bills.

-Annual Returns together with the Annexures

-Register of Transfer and Transmission of shares/Debentures and other securities

-Scrutinizer's Report on Postal Ballot and AGM.

-Documents relating to appointment of Managerial Personnel

-Dividend reconciliation statement till the time the dividend is transferred to IEPF

C. SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

-All reports filed with the stock exchanges from time to time.

-All disclosure of various events and Press Releases.

-Intimations of Board Meetings.

D. Documents filed with Stock Exchanges under SEBI Regulations

-All disclosures and intimations filed under:

-SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.

-SEBI (Prohibition of Insider Trading) Regulations, 2015

-All disclosures and intimations filed under SEBI (Share Based Employee Benefit) Regulation, 2014 and SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines 1999.

E. Documents to be maintained for 8~~5~~ years:

1. SEBI (Alternative Investment Funds) Regulations:

- Funds/Scheme related documents;

- Valuation policies and practices;

- Investment strategies;

- Particulars of investors and their contribution; and

- Rationale for investments made.

- Orders, if any, passed by SEBI with respect to alternative investment fund management activities.

2. B. SEBI (Portfolio Managers) Regulations:

- Periodic Reports
- Balance sheet at the end of each accounting period;
- Profit and loss account for each accounting period;
- Auditor's report on the accounts for each accounting period;
- Statement of financial position and;

- Records in support of every investment transaction or recommendation which will indicate the data, facts and opinion leading to that investment decision.
- Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means

6. Review of Policy

This Policy shall be reviewed by the Board as may be deemed necessary and in accordance with any statutory /regulatory requirements. In case of any change/amendment in applicable statutes/regulations, the Policy shall stand revised to the extend thereto.