POLICY FOR
PRESERVATION OF DOCUMENTS

{PURSUANT TO SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015}

ARIGATO UNIVERSE LIMITED

1. Legal Framework

Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligation and disclosure requirements on all the listed entities, one of the common obligations for all the listed entities, pursuant to Regulation 9 is to formulate and put place a policy for preservation of documents.

The Board of Directors of Arigato Universe Limited is obliged to formulate a policy for the "*Preservation of Documents*" to comply with the requirements of Regulation 9 of the Listing Regulations.

The Company undertakes that all policies shall always be in compliance with the provisions of the Companies Act, 2013 and any other applicable Laws, Rules and their amendments.

2. Definitions

i. **"Board of Director" or "Board"** means the Board of Directors of Arigato Universe Limited, as Constituted from time to time.

ii. **"Company"** means "Arigato Universe Limited"

iii. **"Document(s)"** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage device etc., and the like as required to be maintained under any law or regulation for the time being in force.

iv. **"Electronic Record(s)"** means the electronic record as defined under clause (t) of subsection (1) of Section 2 of the Information Technology Act, 2000.

v. **"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.

vi. **"Maintenance"** means keeping Documents, either physically or in Electronic Form.

vii. **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.

viii. **"Regulations"** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

3. Objective

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them into at least two following categories as follows:

- Documents whose preservation shall be permanent in nature;
- Documents with a preservation period of not less than eight (8) years after completion of the relevant transactions.

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

The Policy sets the Standards for managing, storing and preservation of documents of the Company broadly classified into 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, and 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 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.

4. Role and 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.

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 arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

6. Mode of Maintenance

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of laws, rules, and regulations with regards to maintenance of records shall be adhered to.

All the records shall be maintained as per prescribed formats, if any, as amended from time to time under the various rules and regulation.

7. Disposal and 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 department head(s). 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. The Document may be destroyed as follows:

a) Recycle non-confidential records; or
b) Shred or otherwise render unreadable confidential paper records; or
c) Delete or Destroy electronically Stored Data.

8. Amendments

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provisions(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.

Annexure 1

Documents whose preservation shall be permanent in nature:

S. No.	Nature of Document(s)
1.	Original Signed and Stamped Memorandum of Association and Article of Association of the Company
2.	Registration Certificates
3.	Licenses & Statutory Approvals
4.	Register of Members along with Index
5.	Foreign Register of Members, if any
6.	Register of Loan Guarantee Security and Acquisition made by the Company
7.	Register of Investment not held its own name by the Company, if any
8.	Register of Contracts with Related Parties and Contracts and Bodies etc. in which directors are interested
9.	Register of charges
10.	Registers of Renewed and Duplicate Share Certificates
11.	Registers of Director and KMP
12.	Intellectual Property Documents shall include but shall not limited to the copyright, Trademarks, Patents, and Industrial Design. Intellectual Property rights documents that are owned by the company shall be retained by company permanently
13.	Audited Financial Statements
14.	Minutes of General Meeting
15.	Minutes of Board Meeting
16.	Minutes of various Committee Meetings
17.	Material Agreements/Contracts
18.	Order issued by Courts/Statutory Bodies
19.	Investments Documents/proof including certificates etc
20.	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:

S. No.	Nature of Document(s)
1.	Books of Accounts together with the vouchers relevant to any entry in such books of Accounts
2.	Register of Debenture holders (including Foreign register of Debenture holders) or Register of any other securities issued by the Company
3.	Copies of all Annual Returns
4.	Relevant material related to General Meetings, Board Meetings and Committee Meetings
5.	Instruments Creating Charge or Modification of Charge, if any
6.	Documents or forms filed with Statutory Authorities
7.	Contracts, Arrangements and Subcontracts related to Work
8.	Disclosures received from Directors and KMP
9.	Register of Deposits accepted or renewed, if any
10.	Insurance Policies / Claims under policies
11.	Tax Records include, but are not limited to documents covering Tax assessment, Tax Filing, Proof of deductions, Tax Return, and appeals preferred against any claim made by the relevant Tax Authorities. Shall be maintained for the period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for appeal, as the case may be
12.	Employment/ Personnel Record in case of employees of the Company
13.	Relevant Marketing and Sales Documents
14.	Press Releases
15.	Excise and Service records
16	HR and personnel records as per law or eight years whichever is later