
POLICY ON PRESERVATION OF DOCUMENTS

SKYWAYS AIR SERVICES LIMITED



1. PREAMBLE

Regulation 9 of the SEBI LODR Regulations requires every listed company to formulate this Policy shall be approved by the Board of Directors.

Accordingly, this Policy is made and approved by the Board of Directors ("**Board**") in its meeting on **10th June, 2025**.

2. DEFINITIONS

Unless repugnant to the meaning or context thereof, the following expressions, wherever used in this Policy, shall have the meaning assigned to them below:

- i. "**Books of Accounts**" as defined in Section 2(13) of the Act.
- ii. "**Company**" means Skyways Air Services Limited.
- iii. "**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.
- iv. "**Maintenance**" means keeping documents, either physically or in Electronic Form.
- v. "**Policy**" means this Policy on Preservation of Company Documents.
- vi. "**SEBI LODR Regulations**" means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.

3. OBJECTIVE OF THE POLICY

Thus, this Policy is framed with an objective of classifying records, registers, returns etc. 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:
- for the purpose of such Maintenance and preservation as prescribed.

4. PRESERVATION OF DOCUMENTS

4.1. The Documents shall be preserved under following two categories:

(i) PERMANENT NATURE:

The documents of a permanent nature which is given 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.

(ii) SPECIFIED PERIOD:

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions which is given in Annexure 2 which 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.

4.2. In the event the Company is served with any notice for documents from any of the statutory authorities or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of such notice or litigation shall be suspended until such time the matter is settled, resolved or disposed off. The relevant authorised person shall be responsible for informing all relevant employees of the Company about suspension of further disposal of documents.

4.3. The respective functional/ departmental heads of the Company shall be responsible for Maintenance and preservation of documents in respect of the areas of functions falling under the charge of each of them, in terms of this Policy. They shall also designate an authorised person who shall ensure compliance of this Policy.

5. DESTRUCTION OF DOCUMENTS

The documents specified in Annexure 2 which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and manner as specified and approved by the Functional/ Departmental Heads.

6. AMENDMENT TO THE POLICY

The Policy would be reviewed on an annual basis by the Board. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors. However, the amended regulatory requirements will supersede the existing Policy till the time Policy is suitably amended.



ANNEXURE 1

Documents / Record whose preservation shall be permanent in nature

S. No.	Documents/ Records
1.	Certificate of Incorporation
2.	Memorandum and Articles of Association
3.	Agreements made by the Company with stock exchanges, depositories, etc
4.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act and as per the applicable Secretarial Standards
5.	Register and Index of Members
6.	Register of Contracts as per Companies Act
7.	Register of Charges as per Companies Act
8.	Register of Investments as per Companies Act
9.	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10.	Authorization / licenses obtained from any statutory authority
11.	Policies of the Company framed under various regulations
12.	Register of disposal of records
13.	Annual Reports of the Company
14.	Material Agreements of the Company
15.	Register of loans, guarantees, security and acquisition
16.	Such other records as may be required under any law from time to time



ANNEXURE 2

Documents / Records to be preserved for a minimum period of Eight Years

S. No.	Documents/ Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act
2.	Annual Returns as per Companies Act
3.	Register of Deposits as per Companies Act
4.	Register of Allotment (from the date of each allotment) as per Companies Act
5.	Annual financial statements including: - Annual accounts - Directors report - Auditors report
6.	Books of Accounts including Vouchers / Voucher register as defined under the Companies Act
7.	Income Tax Returns filed under Income Tax Act, 1961
8.	All notices in form MBP-1 received from Directors and KMPs along with any amendment thereto
9.	Return of declaration in respect of beneficial interest in any share as per Companies Act
10.	Copy of newspaper advertisement or publications
11.	Compliance Reports received from any statutory authority
12.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
13.	Disclosure/Return filed under SEBI Listing Regulations
14.	Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers
15.	Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM)
16.	Any other Document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act and/or the SEBI Listing Regulations

