

INNOTERRA LIMITED
(FORMERLY KNOWN AS MILKLANE DAIRY SERVICES PRIVATE LIMITED)

CIN: U52101MH2015PLC269084

Website: www.innoterra.in

Policy on Preservation and Archival of Documents

Date of Original adoption / Revision	Effective date of Policy
Adoption:	23 rd June, 2026
Revision:	

A. INTRODUCTION:

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 “Listing Regulations”**) 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 Listing Regulations forms part of this Policy. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

B. PURPOSE:

The purpose of this document to present a high level policy statement for **Innoterra Limited (formerly known as MilkLane Dairy Services Private Limited) (“the Company”)** 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.

Accordingly, the Policy named **Policy on Preservation and Archival of Documents (“the Policy”)** has been formulated and adopted by the Board of Directors (“the Board”) of the Company.

C. CLASSIFICATION:

Based on the recommendation of the management of the Company, the Board of Directors has identified following classes for Preservation and archival of various documents;

Sr. No.	Category	Annexures
1	Documents whose preservation shall be permanent in nature	Annexure-A
2	Documents to be preserved for not less than eight years or as prescribed under the applicable laws, whichever is longer	Annexure-B
3	Other documents which may be preserved for less than 08 years	Annexure-C

D. APPLICABILITY AND MODES OF PRESERVATION

- a. This Policy is applicable to all Documents maintained in physical and electronic mode by the Company and covers records retained at the Company's own location and/or at the locations of the Registrars and Share Transfer Agents appointed by the Company.
- b. The responsibility of maintaining the records would be with the concerned departments within the Company. Records will be maintained for the periods stipulated in the concerned legislation, after which they may be destroyed in the manner provided in this Policy.
- c. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the Documents.
- d. The Documents not specifically covered under this Policy shall be preserved and maintained in accordance with the provision of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.
- e. This Policy shall come into force from the date of approval by the Board of Directors.

E. DEFINITIONS

"Applicable laws" means securities laws defined under Regulation 2(1)(zf) of the SEBI Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

"Authorised Persons" means the respective Functional/ Departmental heads of the Company.

"Board" means Board of Directors of the Company as constituted from time to time.

"Company" means Innoterra Limited (formerly known as MilkLane Dairy Services Private Limited) and its subsidiaries (if any).

"Document/s" includes all papers, notes, notices, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.

"Electronic Form" means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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.

"Policy" means this Policy on Preservation of Documents formulated by the Company.

"Compliance Officer" means the compliance officer appointed by the Company from time to time.

The words or expressions used but not defined herein, shall have the meaning ascribed to

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them under the Companies Act, 2013 or the SEBI Listing Regulations as applicable.

F. MODE OF PRESERVATION & RESPONSIBILITY

The Authorized Person 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;
- e. make appropriate provisions for back up of all preserved Documents, both physically and electronically.

The Compliance Officer of the Company will be responsible for administration and compliance of this Policy.

G. DESTRUCTION OF DOCUMENTS:

After the expiry of the retention period, the Authorized Person may destroy the preserved Documents in such a mode as deemed fit. The Compliance Officer or/and Managing Director of the Company shall approve the destruction of such Documents.

The Authorized 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.

H. 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 Listing Regulations on the website of the Company under the section entitled ["Investor Info"] for a period of five years and thereafter the same shall be archived for retrieval for such period as decided by the Compliance Officer or/and Managing Director of the Company.
- b. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary 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.

I. 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.

J. 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 Listing Regulations and/or any other laws in this regard shall automatically apply to this Policy.

Annexure-A

Documents / Record whose preservation shall be permanent in nature

Sr. No.	Documents / Records
1.	Certificate of Incorporation- (COI)
2.	Memorandum and Articles of Association - (MOA) & (AOA)
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, debenture-holders, if any or other security holders, if any
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.	Such other records as may be required under any law from time to time

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Annexure-B

Documents / Records to be preserved for a minimum period of eight years.

Sr. No.	Documents / Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013.
2.	Annual Returns as per Companies Act, 2013.
3.	Register of Deposits as per Companies Act, 2013.
4.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013.
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, 2013.
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)

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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
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Annexure-C

Documents which may be preserved for less than 08 years.

List of Documents available on the website of the Company.

Sr. No.	Documents / Records
1.	Basic information about the Company including the details of its businesses
2.	All information and/or Documents required to be posted on the website as specified in the Companies Act, 2013 and/or Regulation 46(2)/Regulation 30 of the SEBI (LODR) Regulations, 2015.
3.	All Documents required to be filed with Stock Exchanges under aforesaid Regulations.
4.	Any changes in the content shall be updated within 2 working days on the website.
5.	The information/Documents provided on the website shall be for current financial year & for preceding five financial years.

The above documents as uploaded and maintained on the Company's website as per the tenure prescribed in the respective Act, Regulations etc. will be archived for a period of three (3) years and thereby destroyed as per this Policy