

¹SWIGGY LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

1. PURPOSE

The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “**SEBI Listing Regulations**”) *inter alia* mandate listed entities to frame policy for preservation of documents.

Regulation 9 of the SEBI Listing Regulations requires the Board of Directors of the Company to frame a Policy for Preservation of Documents (“Policy”) classifying them into two categories:

- i) Documents whose preservation shall be permanent in nature. Illustrative list as listed in **Annexure – 1**; and
- ii) Documents to be preserved for not less than eight years or as prescribed under the applicable laws, whichever is longer. Illustrative list as listed in **Annexure - 2**.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that all the documents, whether in physical or Electronic Form, form an important and integral part of the Company’s records. The preservation of Documents is important in order to ensure immediate access to the records, its retrieval and authentication.

2. APPLICABILITY AND MODES OF PRESERVATION

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.

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.

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.

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.

This Policy shall come into force from the date of approval by the Board of Directors.

¹ Formerly Bundl Technologies Private Limited and Swiggy Private Limited

3. 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 Swiggy Limited and its subsidiaries.

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

4. ROLES AND RESPONSIBILITIES

The Authorised Persons shall be responsible for maintenance and preservation of Documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

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

5. CLASSIFICATION OF DOCUMENTS

For the purpose of the Policy, the documents of the Company are classified as follows:

- (i) Documents which need to be preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time as listed in Annexure - 1.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company.

- (ii) All other documents shall be preserved for the time period as prescribed under the applicable law, illustrative list whereof is provided in annexure-2

6. MODES OF PRESERVATION

- The Documents may be preserved either in physical form or electronic form.
- The Authorized Persons shall be the person(s) responsible to preserve the Documents.
- The preservation of Documents should be 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.
- The preserved Documents must be accessible at all reasonable times. Access may be controlled by the Authorized Persons for preservation, so as to ensure integrity and confidentiality of the Documents and prohibit unauthorised access.
- The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

7. DESTRUCTION OF DOCUMENTS

The preserved Document can be destroyed after the expiry of preservation period as mentioned in this Policy with the approval of the Board, in cases where the approval of Board is mandated by any law or regulations for the time being in force, or by the Head of the Department, under intimation to the Company Secretary of the Company. Authorised Persons should keep proper records of documents destroyed.

8. REVIEW

This Policy may be reviewed and amended from time to time by the Board, in line with the changing regulatory requirements, or in case the Company faces any practical difficulties in implementing the Policy.

9. COMPLIANCE

All employees of the Company are required to comply with the provisions of this Policy. Failure to comply by any employee of the Company with this Policy shall be deemed to be violation of code of conduct which may result in disciplinary action by the Company, including suspension or termination of employment.

Any queries regarding this Policy may be referred to the responsible person, who is in charge of administering, enforcing and updating this Policy.

10. 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 and procedures.

VERSION HISTORY

Sl	Version	Approved by	Effective Date	Amendment Summary
1	I	Board	Date of Listing of shares of the Company with the Stock Exchanges	Policy Drafted

Annexure 1:

Documents whose preservation shall be permanent in nature:

Sr. No.	Nature of Document(s)
1	All documents and Information originally filed with ROC for Incorporation of Company
2	Memorandum of Association and Articles of Association as originally filed and updated from time to time
3	Statutory Registers required to be maintained as per Companies Act 2013, including but not limited to Register and Index of Members, Register of Contracts, Register of Charges, Register of Investments etc.
4	Minutes of General Meeting
5	Minutes of Board Meeting
6	Minutes of various Committee Meetings
7	Annual Reports of the Company
8	Material Agreements of the Company
9	Court Orders
10	Development/Intellectual Property Documents
11	Shareholders' and Joint Venture Agreements
12	Letter of offers – like IPO, Rights Issue, Buy back etc
13	Any other documents or records as may be required to be preserved under any law from time to time.
14	Any other records as may be decided by the Chief Financial Officer of the Company from time to time

Annexure 2:

Documents with preservation period of not less than eight years after completion of the relevant transactions:

Sr. No.	Nature of Document(s)
1	Books of Accounts, Bank Statements and Vouchers
2	Annual Return(s)
3	Register of Debenture holders
4	Index of Debenture holders
5	Filings with Stock Exchanges, Registrar of Companies and other statutory authorities
6	Tax related records and documents
7	Any other documents or records as may be required to be preserved under any law from time to time.
8	Any other records as may be decided by the Chief Financial Officer of the Company from time to time
9	Any other Document, certificates, statutory registers, agreements 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