MPHASIS LIMITED

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DOCUMENT PRESERVATION AND ARCHIVAL POLICY

Document Contact Information

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1. PURPOSE

The Board of Directors (the "**Board**") of Mphasis Limited (the "**Company**") has adopted the Document Preservation and Archival Policy (the "**Policy**") in accordance with Regulations 9 and 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time ("**the Listing Regulations**").

2. SCOPE AND OBJECTIVE

This Policy applies to all employees and directors of the Company and its subsidiaries, including individuals engaged on a permanent, temporary, contractual, or consulting basis.

The objective of this Policy is to:

- Establish uniform standards for the retention, storage, archival, and disposal of documents and records;
- Ensure compliance with applicable legal, regulatory, tax, accounting, audit, and business requirements;
- Facilitate the efficient retrieval of records for operational, legal, and regulatory purposes;
- Minimize risks associated with the unauthorized destruction, loss, or misuse of records; and
- Promote good corporate governance and effective record management practices.

Retention periods under this Policy are determined based on applicable laws and regulations, tax and audit requirements, contractual obligations, and legitimate business needs.

All documents, records, information, and data received, created, maintained, or stored by employees in the course of their employment or engagement with the Company are the property of the Company and shall be managed, retained, archived and disposed of in accordance with the retention periods and requirements prescribed by this Policy.

3. PRESERVATION OF DOCUMENTS

The Company shall preserve and maintain its documents and records as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time to time.

The retention periods applicable to various categories of documents and records are set out in Annexure A to this Policy.

All Company records that are subject to an open audit, unresolved claim, litigation, government investigation or administrative proceeding, shall be preserved until the final conclusion of such matter and until otherwise directed by the Legal Department.

All such events or information that has been disclosed to stock exchange(s) under Regulation 30 of the Listing Regulations shall be hosted on the Company's website for a period not less than five (5) years, after which the same may be archived for a period of 3 years.

4. MODE OF MAINTENANCE OF DOCUMENTS

a) The Company shall maintain documents and records either in physical or electronic form or both, as may be appropriate. The applicable provisions of law, rules and regulations relating to the maintenance, preservation, and storage of records in physical and/or electronic form shall be complied with at all times.

b) Physical records may be maintained at the Company's registered office, other business premises or at an approved off-site storage facility.

c) All physical records shall be appropriately classified, filed, labeled, indexed and stored in secure storage facilities designated by the Company.

d) Any information or record maintained in electronic form pursuant to this Policy shall be stored on approved Company systems, servers, or other authorized electronic storage platforms. Electronic records containing confidential, proprietary, or sensitive information shall be protected through appropriate access controls and security measures.

e) Physical records that are eligible for disposal may be destroyed through secure methods, including shredding. Electronic records may be destroyed by permanent deletion or such other secure methods as may be prescribed by the Company to prevent recovery or misuse.

f) Electronic mail communications, including attachments, that are more than one year old and are not required to be retained under this Policy, any applicable law, contractual obligation, or business requirement may be deleted in accordance with the Company's information management procedures.

5. SUPPLEMENTARY PROVISIONS

In accordance with the Listing Regulations, this Policy shall be disclosed on the Company's website at www.mphasis.com.

This Policy shall be reviewed periodically by the Board and may be amended from time to time to ensure continued compliance with applicable laws and regulations.

In the event of any amendment, modification or re-enactment of the Listing Regulations or any other applicable law resulting in any provision of this Policy becoming inconsistent with such law, the provisions of the Listing Regulations or the applicable law shall prevail and this Policy shall be deemed to have been modified to the extent necessary to make it consistent with such law.

This Policy shall be read in conjunction with all other applicable policies, standards, and procedures of the Company. Any questions regarding the interpretation, implementation, or administration of this Policy, or the Company's records management processes, shall be referred to the owner of this Policy.

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Annexure A

DOCUMENT RETENTION SCHEDULE

Sl. No.	Category of Documents / Records	Retention Period
1	Certificate of Incorporation	Permanent
2	Memorandum of Association and Articles of Association, including amendments thereto	Permanent
3	Statutory Registers maintained under Companies Act, 2013	Permanent
4	Minutes of Shareholders' Meetings	Permanent
5	Minutes of Board Meetings and Committee Meetings	Permanent
6	Intellectual Property registrations and records having continuing legal effect	For the life of the intellectual property right
7	Orders, approvals and licenses having continuing effect	Permanent
8	Books of Account and Financial Records	8 financial years or such longer period as required under applicable law.
9	Tax Records and Supporting Documents	8 years from the relevant assessment year or such longer period as required under applicable law.
10	Annual Returns and Statutory Filings	8 Years
11	Press Releases and Stock Exchange Filings	8 Years
12	Secretarial and Compliance Records not required to be maintained permanently	8 Years
13	Internal Audit Reports and Supporting Records	8 Years
14	Structured Digital Database maintained under the SEBI (Prohibition of Insider Trading) Regulations, 2015	8 Years from completion of the relevant transaction or until completion of any investigation or enforcement proceeding, whichever is later
15	Employment Records, including recruitment, personnel, performance and disciplinary records	7 Years from cessation of employment
16	Executed Contracts and Agreements	3 years following expiry/termination or 8 years from execution, whichever is later
17	Attendance register, notices, agenda, notes to agenda and other related communications to the Board and Committees of the Board relating to convening and conduct of meetings, including presentations and supporting materials	8 years
	Proof of sending Notice and its delivery of the meetings of the Board and Committees of the Board	3 years
18	General Corporate Records not specifically covered elsewhere in this Schedule	3 years
19	Documents relating to ongoing litigation, arbitration, claims, investigations, audits or regulatory proceedings	Until final closure of the matter and approval for disposal by the Legal Department

Note: Where any applicable law, regulation, contractual obligation, audit requirement, tax requirement or business need requires a longer retention period than specified above, such longer retention period shall prevail.

Document Change History

Version	Author	Date	Summary
V 1.0	A Sivaram Nair	1 December 2015	Adopted pursuant to SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
V 2.0	Subramanian Narayan	21 October 2020	Amendment to align to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2020
V 3.0	Mayank Verma	5 November 2026	Reviewed and aligned with regulatory requirements