

# **SURAJ ESTATE DEVELOPERS LIMITED**

## **POLICY ON PRESERVATION OF DOCUMENTS**

### **1. Preamble**

In terms of Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 and applicable provisions of Companies Act, 2013, Suraj Estate Developers Limited “the Company” is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations in at least two categories as specified in the said Regulation.

### **2. Purpose**

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements.

### **3. Preservation of documents**

As per Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 and applicable provisions of Companies Act, 2013, the Company shall have a policy for preservation of documents, approved by the Board of Directors classifying the documents into two categories as follows:

- a. Documents whose preservation shall be permanent in nature **(Annexure –A)**
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions **(Annexure –B)**

### **4. Modes of preservation**

The Documents as mentioned above may be preserved either in Physical form or Electronic Form

### **5. Authenticity**

Where a document is being maintained both in physical form and Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

## 6. Roles & Responsibilities

The respective Functional / Departmental heads of the Company 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.

## 7. Disposal of Documents

The documents specified in Annexure-B which are not required to be maintained and preserved permanently, may be destroyed / disposed off after the expiry of the specified retention period in such mode and under the instructions of the relevant functional/ departmental heads.

## 8. Archival Policy

The events or information of the Company disclosed to the stock exchanges (**the "Disclosed Information"**) where the securities of the Company are going to be listed, shall be disclosed on the website of the Company and shall be hosted on the Website of the Company for a minimum period of five years from the date of each such disclosure (**"Mandatory Hosting Period"**).

Beyond the Mandatory Hosting Period, the Disclosed Information shall be archived for further period of three years (**"The Archival Period"**).

## 9. Amendment / Disclosure

The Board 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.

This policy as amended from time to time shall be made available at the website.

## **Annexure – A**

### **List of documents / record whose preservation shall be permanent in nature:**

1. Certificate of Incorporation;
2. Memorandum and Articles of Association;
3. Minutes Books of Board meetings, General meetings and Committees meetings as per Companies Act and as per applicable Secretarial Standards;
4. Register and Index of Members, debenture-holders, or other security holders, if any;
5. Register of Contracts as per Companies Act;
6. Register of Charges as per Companies Act;
7. Register of Investment as per Companies Act;
8. Authorization / Licenses obtained from any Statutory Authority ;
9. Policies of the Company framed under various regulations;
10. Agreements entered into by the Company with Stock Exchanges / Depositories etc;
11. Annual reports of the Company;
12. Signed Audited Financial Statement;
13. Pan Card & TAN;
14. GST/Service tax/Vat registration certificates;
15. Order issue by tax Authorities;
16. Courts order issued if any;
17. Agreements with debenture Trustees;
18. Certificate of registration under Employees Provident Funds & Miscellaneous Provisions Act 1952;
19. Certificate of registration under Employees State Insurance Act 1948 and
20. Such other records as may be required under any law from time to time.

## **Annexure – B**

### **List of documents / record to be preserved for the minimum period of eight years**

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. Books of accounts including Vouchers and Vouchers register (including vendor agreements) as defined under the Companies Act;
6. Income Tax Returns filed under Income Tax Act, 1961;
7. All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto;
8. Return of declaration in respect of beneficial interest in any share as per Companies Act;
9. Copy of newspaper advertisement or publications;
10. Compliance Reports received from any statutory authority;
11. The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means;
12. Disclosure/Return filed under SEBI LODR Regulations;
13. Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers;
14. Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM);
15. 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 LODR Regulations;
16. Auditors' reports (Internal/Tax);
17. Returns filed under respective State/Municipal Professional Tax Act and
18. Returns filed under respective Labour Welfare Funds Act.