

RAMKY INFRASTRUCTURE LIMITED

Policy for Preservation & Archival of Documents

1. PREAMBLE AND SCOPE

- a. Regulation 9 of Securities and Exchange Board of India (Listing Obligations) and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations” or Regulations] requires every listed Company to have a policy on Preservation of Documents/records maintained by the Company either in Physical Mode or Electronic Mode and archival of documents in the website .
- b. The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed

2. DEFINITIONS

2.1 “Act” means the Companies Act, 2013.

2.2 “Applicable Law” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

2.3 “Authorized Person” means any person duly authorized by the Board if any or all the employees on permanent rolls of the company

2.4 “Board” means the Board of directors of the Company or its Committee.

2.5 “Company” means **RAMKY INFRASTRUCTURE LIMITED**.

2.6 “Current” means running matter or whatever is at present in course of passage.

2.7 “Document(s)” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and 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 and does not include multiple or identical copies.

2.8 “Electronic Record(s)” means the electronic record as defined under clause (t) of Subsection of section 2 of the Information Technology Act, 2000.

2.9 “Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, 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.

2.10 “Maintenance” means keeping Documents, either physically or in Electronic form.

2.11 “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

2.12 “Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

2 OBJECTIVES OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for discarding the same.

The major objectives of the policy are:

- a. To identify statutory registers and other records of the Company which are required to be preserved;
- b. To identify and categorize the Statutory Registers and Records to be maintained either for a period of eight years or permanently.
- c. To decide the mode of preserving the documents, whether in physical form or in electronic form;
- d. To decide after completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at that time.;
- e. To aid employees of the Company in understanding their obligations in retaining and preserving the documents and records

3 INTERPRETATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

4 CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

Regulation 9 of SEBI (LODR) Regulations provides that the Company shall have a policy for preservation of documents, approved by its Board of Directors, classifying them 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.

Accordingly, the Company has classified the preservation of documents to be done in the following manner:

- a) Documents that needs to be preserved and retained permanently;
- b) Documents that needs to be preserved and retained for a period of 8 years as specified under the Act or Regulation;
- c) Documents that needs to be preserved and retained for such period as applicable to the company;
- d) Where there is no such requirements as per applicable laws, then for such period as the documents pertains to a matter which is "Current"

An indicative list of the Documents and the timeframe of their preservation is provided in "**Annexure**".

5 MODES OF PRESERVATION

The Documents may be preserved in:-

- 6.1** Physical Form; or
- 6.2** Electronic Form.

All the Employees on the permanent rolls of the Company are responsible for preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

The preservation of Documents should be such as 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 Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

6 DESTRUCTION OF DOCUMENTS

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure- I** may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the

documents Preservation Schedule given under **Annexure- I**. The details of the documents destroyed by the company shall be recorded in the Register for disposal of records to be kept by employees who are disposing of the documents in the format prescribed at **Annexure- II**. The entries in the register shall be authenticated by the authorized person.

8. WEB ARCHIVAL POLICY

8.1 The Company shall disclose on its website all events or information which has been disclosed to Stock Exchange(s) and retain the same for period of five years.

8.2 At the end of five years, the information shall be archived and preserved for a further period of three years.

9. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Managing Director of the Company is authorised to periodically review the policy and make such changes as considered necessary.

10. MODIFICATION OF POLICY

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

ANNEXURE -1

A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:	B. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:
<ol style="list-style-type: none"> 1. Accounting and Finance records including Annual Financial statements and Audit Reports; 2. Investment records; 3. Tax records including annual returns; 4. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks; 5. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records; 6. Personal files of individual employees (Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc); 7. Any other record as may be decided by any KMP (as per Companies Act 2013) or the Managing Director or the Board of Directors of the Company from time to time; 8. Filings with Registrar of Companies. 9. Minutes of Board meeting (SS-1) 	<ol style="list-style-type: none"> 1. Bank Statements and vouchers; 2. Filings with Stock Exchanges and other statutory authorities; 3. Corporate Social Responsibility Records; 4. Sponsorship Projects Records; 5. Correspondence and Internal Memoranda; 6. Any other record as may be decided by the Managing Director of the Company from time to time; 7. Security Deposit Receipts (after receipt of deposit money back); 8. Tender Documents; 9. Lease Deeds and Contracts; 10. Legal files; 11. Insurance Records including policies and claims; 12. All e-mail correspondence, internal & external; 13. Any other record as may be decided by the Managing Director of the Company from time to time. 14. Office copies of Notices, 15. scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2) 16. Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 10 years or as long as they remain current

Annexure –II

THE FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED/DESTROYED

PARTICULARS OF DOCUMENTS ALONGWITH PROVISION OF APPLICABLE LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF AUTHORISED

