

PARSVNATH DEVELOPERS LIMITED

POLICY FOR MAINTENANCE AND PRESERVATION OF DOCUMENTS

1. Preface

The Board of Directors (the “Board”) of Parsvnath Developers Limited (the “Company”) has adopted the following policy with regard to preservation of Documents. This Policy has been formulated in accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

This Policy will be applicable to the Company effective from December 01, 2015.

2. Purpose of the Policy

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 and regulatory provisions applicable to the Company and to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under Regulation 9 of Listing Regulations.

Provided further that the Company may keep the documents as specified above in electronic mode.

3. Type of Documents and time period for preservation

The main purpose of the Policy is to have a binding framework for the preservation of documents of the Company, as approved by the Board of Directors of the company, in the following categories:

Category (A): The documents of permanent nature (listed in **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

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

Category (B): The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in **Annexure-2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

For the purpose of this policy, document may include the following:

- i. 'books and papers' as defined in Section 2 (12) of the Companies Act, 2013;
- ii. 'books of accounts' as defined in Section 2 (13) of the Companies Act, 2013;
- iii. 'documents' as defined in Section 2 (36) of the Companies Act, 2013 and
- iv. 'registers' as defined in clause Section 2 (74) of the Companies Act, 2013.

Further, the Company may maintain above mentioned documents in electronic form to the extent possible.

4. Roles & Responsibilities

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

5. Periodical Review of the Policy

The Policy will be reviewed periodically by the Management and amendment(s), if any to the same will be done subject to the approval of the Board of Directors.

6. Record Appraisal

The Company shall at regular intervals carry out the appraisal of the records. The purpose of the appraisal process shall be to ensure that the records are examined at the appropriate time to determine (i) whether they need to be retained for a longer period as they are still in use; or (ii) whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the concerned Department Head of the Company to whom the concerned Records belongs.

7. General

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

8. Disposal of Documents

After the expiry of the statutory retention period, the preserved documents may be disposed off in such mode under any instructions approved by the Board of Directors of the Company.

A register of the Documents disposed off shall also be maintained. It shall state the brief particulars of the documents disposed off, date of disposal and the mode of disposal. The entries in the register shall be authenticated by the authorised person by the Board.

This applies to both Physical and Electronic Documents.

9. Communication

The Policy will be posted on the website of the Company viz. www.parsvnath.com.

10. Amendment

The Board may amend, modify or revise any or all clauses of this Policy in accordance with the applicable provisions of the Listing Regulations and amendment(s) thereto notified by the Securities and Exchange Board of India and/or Stock Exchanges, from time to time. However, amendments in the Listing Regulations shall be binding even if not incorporated in this Policy.

Documents whose preservation shall be permanent in nature:

S. No.	Nature of Document(s)
01	All documents and Information originally filed with ROC for incorporation of the Company
02	Memorandum of Association and Articles of Association as originally filed and updated from time to time
03	Certificates of Incorporation/ Certificates/ Licenses obtained from any statutory authority
04	Agreements made by the Company with Stock Exchanges, Depositories etc.
05	Statutory Registers required under applicable laws
06	Annual Report
07	Minutes of General Meeting
08	Minutes of Board Meeting
09	Minutes of various Committee Meetings
10	Material Agreements/Contracts
11	Orders issued by Courts/Statutory bodies
12	Investment Documents/proofs including certificates etc.
13	Any other document as may be required to be maintained permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure 2

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

S. No	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s) alongwith certificates and documents annexed thereto
03	Insurance Policies/ Claims under various policies
04	Correspondences with Departments/shareholders
05	Register of Debenture holders
06	Index of Debenture holders
07	Non-Statutory Registers/Documents
08	Copies of Notices, Agenda papers for meetings of the Board and Committees and General Meetings thereof along-with Notes on Agenda and other related / supporting documents.
09	Copies of newspaper advertisements and publications
10	All consents, notices, disclosures received from the directors and KMPs
11	Annual financial statements including annual accounts, directors' report, auditors' report
12	Instruments creating / modifying / satisfying the charge
13	Scrutinizer's Report, Register of Postal Ballot, Postal Ballot forms, office copies of the notices, other related documents
14	Forms and returns filed with MCA / RBI or with any other statutory authority
15	Documents relating to Court cases / CBI cases / Police cases / Civil Suits / Labour Court Cases / Arbitration cases etc.
16	Any other document as may be required to be maintained in terms of applicable law(s), maintained and preserved from time to time.