

## **POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS IN ITS WEBSITE**

### **1. Introduction**

Manjeera Constructions Limited ("the Company") has adopted the following policy in accordance with Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations") that requires the Company to frame a policy on preservation of documents. Further, Regulation 30(8) requires the Company to frame a Policy on website disclosure and archival of such disclosure.

This policy will be applicable to the Company effective December 1, 2015.

### **2. Objectives**

The objective of this Policy is to specify the type of document(s) and time period for preservation thereof, classifying them in the following categories:

- a) Documents whose preservation shall be permanent in nature;
- b) Documents with preservation period of not less than 8 years after completion of relevant transaction.

The documents specified in (a) and (b) may be kept in electronic mode.

### **3. Classification of Documents**

The company shall maintain and preserve documents as specified hereunder:

**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.

#### **4. Roles and Responsibilities**

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy.

#### **5. Archival Policy**

The Company shall ensure that all the information disclosed on the Company's website ([www.manjeera.com](http://www.manjeera.com)) is maintained for a minimum period of five years and thereafter to be archived by the IT department for a period of three years.

#### **6. Amendments to the Policy**

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

This Policy will be communicated to all operational employees and other concerned persons of the Company and shall be placed on the website of the Company at [www.manjeera.com](http://www.manjeera.com).

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**Annexure 1**

**Documents whose preservation shall be permanent in nature:**

<b>Sl. No</b>	<b>Record Category</b>	<b>Record Type</b>
1.	<b>Board Meeting and Committee meeting records</b>	<ul style="list-style-type: none"> <li>• Agendas</li> <li>• Internal Audit Reports</li> <li>• Board and Committee meeting minutes</li> <li>• Adopted policies/Codes etc.</li> <li>• Attendance Registers</li> <li>• Disclosure of Interest</li> <li>• Other Miscellaneous reports/records</li> </ul>
2.	<b>General Meeting records</b>	<ul style="list-style-type: none"> <li>• Register and index of members</li> <li>• Minutes</li> <li>• Attendance Register</li> </ul>
3.	<b>Other Secretarial Records</b>	<ul style="list-style-type: none"> <li>• Incorporation/Business commencement certificates</li> <li>• Memorandum of Association and Articles of Association</li> <li>• Common Seal</li> <li>• Annual Reports</li> <li>• Various Statutory register pursuant to Companies Act 1956 and / or Companies Act 2013</li> <li>• Share transfer, transmission correspondences with RTA</li> <li>• Correspondence with statutory bodies.</li> </ul>
4.	<b>SEBI and Stock exchange records</b>	<ul style="list-style-type: none"> <li>• Correspondence with Statutory bodies</li> <li>• Quarterly/Annual/Non- Quarterly/ other compliances from time to time.</li> <li>• Listing Agreement</li> </ul>
5.	<b>Finance</b>	<ul style="list-style-type: none"> <li>• License Certificates/Renewal certificates</li> <li>• Statutory Returns/reports submitted to authorities from time to time.</li> <li>• Audited financial Statements and Audit Reports</li> </ul>
6.		Miscellaneous Licenses obtained from Statutory Authorities
7.	<b>Property Records</b>	<ul style="list-style-type: none"> <li>• Agreements/Contracts</li> <li>• Documents relating to acquisition and sale of property</li> </ul>
8.	<b>Legal</b>	<ul style="list-style-type: none"> <li>• Correspondences with Courts/other statutory bodies regarding petition/case/suit etc</li> </ul>
9.		All confidential agreements and non-disclosure agreements
10.	<b>Personnel Records</b>	<ul style="list-style-type: none"> <li>• Personnel Files of Individual employee</li> <li>• Employee handbook and Induction Manual</li> <li>• Retirement related records</li> </ul>
11.	<b>Labour laws records</b>	<ul style="list-style-type: none"> <li>• Registration/ Renewal Certificate under various acts relating to labour laws</li> <li>• Maintenance of various registers under various laws acts in force read with rules made thereunder.</li> </ul>
12.	<b>Taxation</b>	<ul style="list-style-type: none"> <li>• Registration/Amendment certificate under various relevant provisions in force.</li> <li>• Correspondence with statutory bodies</li> </ul>
13.		Any other document as may be required to maintain 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:**

<b>Sl. No</b>	<b>Record Category</b>	<b>Record Type</b>
1.	<b>Other Secretarial Records</b>	<ul style="list-style-type: none"> <li>• Non-statutory registers</li> <li>• Correspondence with shareholders - from the date the compliant is resolved</li> <li>• Annual returns and other relevant forms</li> </ul>
2.	<b>Insurance records</b>	<ul style="list-style-type: none"> <li>• Insurance policy execution/ Renewal Certificate</li> <li>• Insurance Claim under various policies</li> </ul> <p>From lapse of policy settlement of claim.</p>
3.	<b>Contracts/Agreements/Purchase Orders</b>	<ul style="list-style-type: none"> <li>• Renewal</li> <li>• Modification</li> <li>• Termination of contracts/agreements/purchase orders</li> </ul> <p>From termination of contracts/agreements/purchase orders</p>
4.	<b>Finance</b>	<ul style="list-style-type: none"> <li>• Books of accounts and vouchers</li> </ul>
5.	<b>Taxation</b>	<ul style="list-style-type: none"> <li>• Preservation of specific books of accounts</li> </ul>
6.		Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.