

Purearth Infrastructure Limited

REGD. OFFICE: CENTRAL SQUARE, 20, MANOHAR LAL KHURANA MARG,
BARA HINDU RAO, NEW DELHI-110008.
CIN: U45202DL1991PLC046111

POLICY FOR PRESERVATION OF DOCUMENTS

1. Policy

This policy of Purearth Infrastructure Limited ("**Company**") on preservation of documents ("**Policy**") has been formulated in pursuance of the Companies Act, 2013 read with relevant rules prescribed under the Act. This Policy shall be adopted and approved by the Board of directors of the Company ("**Board**"). This Policy covers not only the various aspects on preservation of the documents, but also safe disposal / destruction of such documents.

2. Objective of the Policy

The main objectives of the Policy are to ensure that:

- (a) all documents and records of the Company are properly classified;
- (b) documents of the Company are properly preserved and maintained; and
- (c) all documents and records that are no longer required to be preserved and maintained under applicable law, are disposed-off in an appropriate manner pursuant to obtaining due approvals in this regard.

3. Definitions

- (a) "**Act**" means the Companies Act, 2013.
- (b) "**Authorized Person**" means any person duly authorized by the Board for undertaking actions specified in this Policy.

- (c) **“Board”** means the board of directors of the Company or any of the committees constituted by it.
- (d) **“Company”** means Purearth Infrastructure Limited.
- (e) **“Document”** includes any data or information set out in papers, notes, agreements, summons, notices, requisitions, orders, declarations, forms, records, registers, correspondence, minutes, whether issued, sent, received by or kept, in pursuance of any law for the time being in force or otherwise, maintained on paper or in Electronic Form.
- (f) **“Electronic Form”** means on any contemporaneous electronic device such as computer, laptop, compact disk, floppy disc, space on electronic cloud, or any other form of storage and retrieval device as specified under clause (r) of sub-section (1) of section 2 of the Information Technology Act, 2000 or as otherwise considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- (g) **“Electronic Records”** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- (h) **“Preservation”** means to keep Documents in good order, to prevent them from being damaged or destroyed.
- (i) **“Record”** means a documentary evidence of past events or transactions, and includes Electronic Records.
- (j) **“Register”** refers to statutory registers maintained under the Act.

4. Classification of Documents

Documents of the Company may be classified in the following manner:

- (a) Documents whose Preservation shall be permanent in nature;

- (b) Documents with a Preservation period of not less than 8 (eight) years after completion of the relevant transactions; and
- (c) Documents that are needed to be Preserved and retained for such other longer period as may be prescribed under any applicable law.

It is clarified that where there is no time period prescribed for Preservation of documents, the same shall be Preserved for at least a period of 8 (eight) years.

An indicative list of the Documents and the time-frame of their Preservation is provided in **Annexure I**.

5. Maintenance and Preservation of Documents

- 5.1 The Documents specified in clause 5 may be preserved for the time periods indicated in either:
 - (i) Physical form, or
 - (ii) Electronic Form
- 5.2 The Authorized Person shall be responsible for the preservation, maintenance and security of all the Documents in Physical form and/or Electronic form. She / He shall ensure compliance with all the requirements related to the preservation, maintenance and security of the Documents as prescribed in this Policy and under applicable law.

6. Disposal of Documents and Records

Documents and Records of the Company, in physical form or Electronic Form, that do not have to be Preserved permanently, may be destroyed at the end of the Preservation period mentioned in Clause 5 above.

7. General

- 7.1 This Policy shall apply to the maintenance and preservation of all the Documents of the Company. Any or all the provisions of this Policy would

be subject to any revision / amendment made to the Act, rules thereunder.

- 7.2 The Company Secretary of the Company is authorized to review, amend or modify the Policy from time to time such that it remains compliant with applicable law. Any amendment or modification in the policy shall be periodically placed before the Board for noting and ratification.

Annexure I
Preservation of Documents

Indicative List

A. Documents whose Preservation shall be permanent in nature

1. Incorporation documents as originally filed with the Registrar of Companies.
2. Memorandum and Articles of Association.
3. Register of renewed and duplicate share certificates
4. Register of members along with index of members.
5. Foreign Register of Members
6. Minutes book of general meetings
7. Minutes book of the Board meetings and committee meetings
8. Register of charges
9. Register of contracts and arrangements in which Directors are interested
10. Register of Directors and Key Managerial Personnel
11. Register of loans, guarantees and securities
12. Register of investments in securities not held in the name of the Company
13. Licenses and key approvals obtained from statutory authorities
14. Record of private placement offers in Form PAS-5.
15. All other Documents which are required to be preserved permanently in accordance with law applicable to the Company from time to time.

B. Documents to be Preserved for not less than eight years after completion of the relevant transactions

1. Register of debenture holders or any other security holders along

with index

2. Annual return and copies of all certificates and documents annexed thereto (Preserved for a period of 8 (eight) years from the date of filing with the Registrar of Companies).
3. Register of deposits
4. Books of accounts (Preserved for a period of 8 (eight) years immediately preceding the financial year).
5. Register of buy back of securities (to be Preserved for a period of 8 (eight) years from the date of completion of buy back).
6. Instrument creating or modifying the charge (Preserved for a period of 8 (eight) years from the date of satisfaction of charge).
7. Register of allotment (Preserved for a period of 8 (eight) years from the date of each allotment)
8. Register of payment of dividend (Preserved for a period of 8 (eight) years from the date of payment of dividend).
9. Register of Directors' attendance (Preserved for a period of 8 (eight) years)
10. Register of proxies (Preserved for a period of 8 (eight) years from the date of the shareholders meeting).
11. Register of sweat equity shares