



Ramsons Projects Ltd.

RAMSONS PROJECTS LIMITED

POLICY ON

PRESERVATION OF DOCUMENTS

Ramsons Projects Limited

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1. Introduction

1.1. The Companies Act, 2013 (the "Act") and previous company law (The Companies Act, 1956) and the Rules framed there under the Act contains various provisions relating to temporary and/ or permanent preservation of various documents of the Company including registers and records and the place at which such documents, registers or records etc. shall be maintained and preserved.

1.2. Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Regulations') mandates every listed entity to frame a policy for preservation of documents, approved by its Board of Directors.

Further such regulation requires that such documents, registers or records etc. shall be classified in at least two categories:

- i. Documents whose preservation shall be permanent in nature;
- ii. Documents whose preservation period of not less than eight years after completion of the relevant transactions.

1.3. Accordingly, Ramsons Projects Limited ('RPL' or the 'Company') herein sets out a Policy for preservation of documents (Hereinafter referred to as the 'Policy').

2. Scope of the Policy

This Policy is applicable on the Ramsons Projects Limited.

3. Objective and Purpose of the Policy

The objective of this Policy is preservation of documents of Ramsons Projects Limited (the "Company" or "RPL") in compliance with the requirements of Listing Regulations, Companies Act, 2013, and Rules framed under the Act and other corporate laws applicable to the Company.

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4. Classification Of Documents To Be Preserved / Retained

As per the Policy of the Company, the Company shall maintain and preserve the documents registers, records and other documents of the Company, as follows:

- a) Schedule I – Documents to be preserved permanently;
- b) Schedule II – Documents to be preserved for the period of Eight Years;
- c) Schedule III – Documents to be preserved for a period of 5 years or such period as may be governed by governing provision in respective act, rule or regulation or such higher period as may be determined by determine by Board of Directors.

Documents to be preserved in this Policy may be either maintained in physical or electronic form as per the provisions of governing act, rules and regulations.

The Documents not governed in this Policy but required to be preserved for such period as may be required by such statue will be preserved accordingly.

The Documents pertaining to any litigation/ petitions/ applications/ court orders or case/ disputes etc. shall be preserved for a period of 5 years from the date of receiving Final Order from the requisite authority. However, in the matter of pending Litigation/ petitions/ applications/ court orders or case/ disputes etc., all necessary documents and records relating to the matter shall be kept preserved as long as the matter continues and thereafter after the Final order is passed, for a period of 5 years.

5. Responsibility of Employees for Preservation of Documents

The Employees of the Company are entrusted with the responsibility for maintenance and preservation of Documents and records of the Company and with the responsibility for keeping the documents in safe custody and not to be handover to anyone else without the written consent or acknowledgement of Compliance Officer or Company Secretary (CS) of the Company or Chief Financial Officer (CFO) of the Company or by the Board of Directors (BOD) or Director of the Company.

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6. Statutory Requirements

If as per the requirement of any other law of land including Information of Technologies Act, any document, whether in Physical form or Electronic, required to be preserved for a period longer than prescribed in the Policy Documents, the same shall be preserved for a period longer than the period stipulated in the Policy Document as per applicable statutory guidelines.

7. Destruction of Documents

The documents specified in Schedule II & III to this Policy, kept by the Company, may be destroyed after the expiration of the period specified in the respective Schedules in the presence of Compliance Officer of the Company. The documents not specified in the schedules shall be destroyed after the period of five years in the presence of Compliance Officer of the Company.

However, in the case of pending matters/litigation/disputes, the documents shall be preserved till the resolution of pending matter/litigation/dispute. The documents shall be destroyed after taking the approval of respective Department Head and in the presence of Compliance Officer of the Company.

8. Suspension Of Record Disposal In The Event Of Litigation Or Claims

In case the Company is served with any notice for request for submission of any Documents, Records or Files, or any employee of the Company becomes aware of any governmental investigation or audit concerning the Company or commencement of any litigation or court proceedings against the Company, any further disposal of any record or document connected with the matter shall be suspended until such time the investigation/ litigation ends.

9. Policy Review/ Amendment in Policy

This Policy may be changed, amended, edited or substituted by the Compliance Officer of the Company, where there are any statutory changes or other changes necessitating the change in the policy.

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Schedule I

The Documents of the Company that are to be preserved permanently:

- 1) Certificate of Incorporation of the Company;
- 2) Certificate of Registration, Authorizations or Licenses obtained by the Company in any other act or regulation from any Statutory Authority;
- 3) Memorandum and Association of the Company duly adapted from time to time;
- 4) Agreements made by the Company with Stock Exchange, Depositories, RTA, etc;
- 5) Policies of the Company framed under various Regulations;
- 6) Files relating to premises of the Company viz. Title Deeds/ Lease Deeds of Company Premises/ Land/ Building, etc. and the related Ledger/ Register as well;
- 7) Books and Papers of Amalgamated Companies shall be preserved until and unless allowed to be destroyed by C/G;
- 8) Minutes of all Meetings of transferor Company;
- 9) Register of Transfer and Transmission of Shares of the Company;
- 10) Register of Renewed and Duplicate Share Certificates;
- 11) Register Of Charges;
- 12) All books and documents relating to the issue of share certificates, including the blank forms of share certificates, in case of dispute;
- 13) The Register of Members and Index;
- 14) The Foreign register of members, unless it's discontinued or all the entries are transferred to any other foreign register or principal register;
- 15) The Minutes Book of General Meetings, Board Meetings and Committee Meetings;
- 16) Register in MBP 2 giving details of loan, guarantee or security given or making an acquisition of securities;

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- 17) Register in MBP 3 giving details of Investments beneficially held by Company but not registered in its own name;
- 18) Register in MBP 4 mentioning the particulars received in MBP-1 and contracts and arrangements with Related Party with respect to the transactions u/s 188;
- 19) Register maintaining the records for disposal of Documents and Records;
- 20) Such other records as may be required under any law or by the resolution of Board of Directors of the Company from time to time.

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Ramsons Projects Limited

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Schedule II

The Documents of the Company that are to be preserved for the period of Eight (8) Years:

- 1) Instrument creating Charge or Modification thereof;
- 2) Register of Debenture holders or other Security holders including the Register of Foreign Debenture holders or other Security holders thereof;
- 3) Annual return and copies of all the certificates or documents annexed thereof;
- 4) The Attendance Register of Board Meetings and Committee Meetings of the Company;
- 5) Office copies of Notices, Agendas, Notes on Agenda and other related papers of the transferor company as handed over to Transferee Company;
- 6) Office copies of Notices, Scrutinizer's Report and other related papers of the transferor company as handed over to Transferee Company;
- 7) Disclosure of Interest By Director MBP-1;
- 8) One or more Registers for Deposits Accepted or Renewed;
- 9) Books and Accounts of the Company together with all the supporting documents such as Bills, Vouchers etc, Balance Sheet and Profit and Loss Statement of the Company;
- 10) The Attendance Register of General Meetings;
- 11) Register of Proxies;
- 12) Details/ Statement of Unclaimed Dividend;
- 13) Such other records as may be required under any law or by the resolution of Board of Directors of the Company from time to time.

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Schedule III

Documents to be preserved for a period of 5 years or such period as may be governed by governing provision in respective act, rule or regulation or such higher period as may be determined by determine by Board of Directors:

- 1) Certificates surrendered to the Company for the purpose of cancellation may be destroyed after the expiry of three years from the date of surrender, provided this doesn't applicable for the Certificates cancelled for Demat process;
- 2) All necessary documents and records relating to petitions and applications dealt by Tribunal shall be preserved for a period of five years after passing of Final Order;
- 3) All books and documents relating to the issue of share certificates, including the blank forms of share certificates shall be preserved for a good period of not less than 30 years at least;
- 4) Register of Sweat Equity Shares;
- 5) Register of Employee Stock Options;
- 6) Record of Private Placements;
- 7) Disclosures from Promoters, Directors, Key Managerial Personnel and others under SEBI (Prohibition of Insider Trading) Regulations, 2015;
- 8) Disclosures from Promoters and others under SEBI (Substantial Acquisitions of Shares and Takeovers) Regulations, 2011;
- 9) Documents filed with Stock Exchanges, Securities and Exchange Board of India, Reserve Bank of India, Ministry of Corporate Affairs, Registrar of Companies, Regional Directors, National Company Law Tribunal, Central Government or other authorities but not prescribed under the policy;
- 10) Register of Directors and Key Managerial Personnel;
- 11) Register of Shares or other Securities Bought back;
- 12) Disclosures of Material Events/ information under Listing Regulations;
- 13) Such other records as may be required under any law or by the resolution of Board of Directors of the Company from time to time.