

PURAVANKARA LIMITED

(formerly Puravankara Projects Limited)

POLICY FOR PRESERVATION OF DOCUMENTS

QMS/PL/13	Date: 12.02.2016	REV. NO. 00
Prepared By	Company Secretary Department	
Reviewed BY	Dy. Chief Financial Officer	
Approved by	Board of Directors	
Issued by	Head Planning & Process / Management Representative	
Process Owner	Company Secretary Department	

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AMENDMENT SHEET

DATE	CHANGE DESCRIPTION	REF	PG. NO.	NEXT ISSUE/REV.NO.

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POLICY FOR PRESERVATION OF DOCUMENTS**Background:**

As per Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, every listed entity shall have policy for preservation of documents, 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:

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 to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

Administration:

The documents preservation schedule is attached as Appendix-A. The Respective Head of Department shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Respective Head of Department shall report to the Managing Director/Joint Managing Director on any non-compliance of the preservation process.

Mode of Maintenance:

The Company shall maintain the necessary documents and records either in physical or electronic mode.

Preservation Location:

The preservation location shall be the respective department or any other place as the head of department decides with the prior approval of the Managing Director/Joint Managing Director of the Company. Any document or records which are required to be maintained at a particular place as per any act or statute shall be maintained at such place and any change shall be made in accordance with such act or statute.

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Procedure for disposal of Documents:

The Documents of the Company which are no longer required as per the time schedule prescribed in Appendix-A may be destroyed. The Administrator 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 Appendix-A. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees duly signed by the respective Head of Department.

Suspension of Documents disposal in the event of Litigation or Claims

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice / Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

Amendment:

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit or from time to time and the decision of the Board in this respect shall be final and binding.

Policy Review:

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to necessary approval of the Board of Directors.

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APPENDIX-A

DOCUMENTS PRESERVATION SCHEDULE**Documents to be maintained permanently:**

1. Statutory Registers to be maintained under the Companies Act 2013 or rules made thereunder
2. Minutes Books of Board, Committee and General Meetings of the Company
3. Scrutinizer Reports
4. Audited Annual and Quarter Financial Statements with Auditor's Report
5. All the records related to Legal Department in terms of court orders, property related documents, contracts, certificates and litigations
6. All the title related documents with respect to Fixed Assets of the Company.
7. All the statutory approvals obtained with respect to Projects undertaken by the Company
8. Insurance- Master Policies and Related Documents
9. All E-mails from internal and external sources that are important and have significant impact and lasting consequences as informed by the respective Head of Departments.
10. Personnel Records of Existing Employees (Past Employees- Three years from the date of relieving)
11. Statutory Registers, Returns and Forms as required under various applicable laws/statutes/regulations
12. Other Documents, records required to be permanently preserved under any applicable law/regulation/statute

Documents to be maintained for a minimum period of 8 years:-

1. Office Copies of Notice, Agenda, Notes on Agenda and related papers – Board, Committee and General meetings
2. Books of Accounts, Ledgers and Vouchers- 8 years from the end of the financial year or after completion of assessment under applicable law, whichever is later.
3. Bank Statements
4. Investment Records
5. Compliance Reports and other filings submitted to the Stock Exchanges, Reserve Bank of India and any other statutory authority under the applicable laws.
6. Records required under various applicable Tax Laws - 8 years from the end of the financial year or after completion of assessment under applicable law, whichever is later.
7. Statutory Records and Registers filed and maintained under various laws in relation to Human Capital and Administration Department of the Company.
8. Final Copies of Marketing and Sales Documents like Project Brochures, Pamphlets or any advertising material and Marketing Policies.

Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department in writing and with an intimation to the Managing Director/ Joint Managing Director of the Company.

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