



# **POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS**

## **KOLTE-PATIL DEVELOPERS LIMITED**

(CIN: L45200PN1991PLC129428)

**Registered Office : 2<sup>nd</sup> Floor, City Point, Dhole Patil Road,  
Pune – 411 001.**

## **1. BACKGROUND**

The Securities and Exchange Board of India ("SEBI"), vide its Notification dated September 02, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Listing Regulations come into force from December 01, 2015. The Listing Regulations mandate listed entities to formulate a Policy for preservation and archiving of documents. It is in this context that the Policy for preservation and Archival of Documents ("Policy") is being framed and implemented.

## **2. OBJECTIVE OF THE POLICY**

The objective of this Policy is to classify the documents in two categories i.e. (i) documents which need to be preserved permanently and (ii) documents which need to be preserved for a specific period of time.

This policy is effective from December 01, 2015.

## **3. DOCUMENTS TO PRESERVED**

The Company has classified the preservations of documents to be done in the following manner:-

- (a) Documents need to be preserved permanently;
- (b) Documents need to be preserved under Companies Act, 2013 and Listing Regulations up to period of 8 years;
- (c) Documents need to be preserved for such period as prescribed under any statute or regulation as applicable to the Company.

An indicative list of documents and the time frame of their preservation is provided in Annexure A.

The Documents may be preserved in physical form or electronic form.

The official of the Company required to preserve the document shall be Authorized Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

The Documents of the Company which are no longer required as per the time schedule prescribed in Annexure A may be destroyed. The concerned officer 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 in Annexure A. The details of the documents destroyed by the Company shall be recorded in the Register of Disposal of the Records to be kept by Employees who are disposing of the documents in the format prescribed at Annexure B. The entries in the register shall be authenticated by the Authorized Person.

#### **4. POLICY REVIEW**

This Policy and the Document Retention Schedule shall be reviewed by the Board from time to time so that the policy remains compliant with applicable legal requirements.

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## Annexure A

Indicative list

### A) Permanent preservation

- i) Common Seal;
- ii) Memorandum and Articles of Association as amended from time to time;
- iii) Minutes books of Board, General Meetings and committee meetings;
- iv) Statutory Registers and Index of Members
- v) Registration Certificates, License and Permission
- vi) Various forms/returns filed and disclosures
- vii) Audited financial statements

### B) Temporary preservation up to 8 years

- a. Annual Returns
- b. Notice, Agenda and supporting documents related to Board meeting, Committee Meeting and General Meeting
- c. Attendance Registers
- d. All notices pertaining to disclosure of interest of directors
- e. Instrument creating a charge or modification
- f. Scrutinizers' Reports on postal ballot and AGM
- g. Dividend reconciliation statements till time the unclaimed dividend is transferred to IEPF
- h. All disclosures/intimations/reports/filings done with Stock Exchanges

### C) Others

As per applicable law

## Annexure – B

### Specimen format of the register of documents disposed of/destroyed

Particulars of documents along with provisions of law	Date and mode of destruction	Initials of the authorized person