

MADHAV INFRA PROJECTS LIMITED
POLICY ON PRESERVATION OF DOCUMENTS
(Effective from 01st December, 2015)

1) Preface

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR Regulations”) and the SEBI Notification No. SEBI/LAD–NRO/GN/2015–16/013 dated September 2, 2015, requires every Listed Company to have a policy on Preservation of Documents / Records maintained by the Company in Electronic Mode or other mode as prescribed under the act. In this context, the Board of Directors of Madhav Infra Projects Limited has adopted this Policy for Preservation of Documents, as required under applicable regulations.

2) Objectives

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.

3) Definitions

- i. **“Act”** means the Companies Act, 2013 and rules made there under, as amended from time to time
- ii. **“Company”** means Madhav Infra Projects Limited
- iii. **“Regulations”** mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time
- iv. **“Document”** includes papers, notes, agreements, summons, notice, requisition, order, declaration, form, advertisement, minutes and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- v. **“Board”** or **“Board of Directors”** means the collective body of the Directors of Madhav Infra Projects Limited, as may be re–constituted from time to time
- vi. **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- vii. **“Electronic Form”** with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer, laptop, Compact Disc, memory, micro film, computer generated micro fiche or any other form of storage.
- viii. **“Preservation”** means keep in good order and to prevent from being altered, damage or destroyed.

4) SCOPE



This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

5) Preservation of Documents

The Company shall preserve all its documents as per the requirement and provisions of the Companies Act, 2013 and the rules made thereunder, the secretarial standards, the Listing Regulations and any other law, rules and regulations and its amendments as may be applicable time to time.

- a) The company shall preserve the following documents on a *permanent basis*:
 - i. The original signed and stamped Memorandum of Association and the Article of Association and the Common Seal
 - ii. Minutes of Board Meetings, General Meetings and Committee Meetings
 - iii. Register of Members along with Index
 - iv. Statutory Register
 - v. Licences and Permissions including Intellectual Property related documents, which includes Copyrights, Trademarks, Patents and Industrial Designs etc.

- b) The company shall preserve the following documents for *at least eight years*:
 - i. Copies of Annual Return
 - ii. Attendance Register, Notice, Agenda including notes on Agenda and any other papers related to Board Meetings, Committee Meetings and General Meetings
 - iii. Disclosure of Interest received from the Directors of the Company
 - iv. Documents related to creation/ modification/ satisfaction of Charge
 - v. Books of Accounts including the vouchers relevant to any entry in books of accounts
 - vi. Tax records including but are not limited to Documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax Authorities. Tax Records shall be maintained for a period of 8 or for a period of 8 (Eight) Years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be.
 - vii. Employment/ Personal Records includes certain documents relating to recruitment, employment and personnel information, performance review, action taken by or against any employee, complaints by or against any employee.
 - viii. Press Release shall include, but shall not be limited to, any intimation given to the press regarding financial results, profits, Meetings of the Board, General Meetings, and overall performance of the Company.
 - ix. Marketing and sales relevant documents
 - x. Legal Documents shall include, but shall not be limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments,



Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter , Awards, Documents relating to property matters.

6) Mode of Preservation

The Company shall maintain these records either in physical or electronic mode. With regards to electronic maintenance of records has to be maintained within the Company's centralized electronic record software database, which is maintained by the IT Service department.

7) Disposal of Records

Physical records disposed of pursuant to the retention periods specified in the Document Retention Schedule shall be disposed of using a cross-cut shredder. The Records Department shall adopt appropriate procedures to permanently dispose of any non-paper physical records, such as photographs or audio/video recordings. In the event that it is necessary to manually dispose of an electronic record, the IT Department shall use the "permanent delete" function to permanently dispose of electronic records.

Amit Khurana

Chairman and Managing Director