

VKJ INFRA DEVELOPERS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. LEGAL FRAMEWORK

The Board of Directors of Singer India Limited (the 'Company') adopted a 'Policy for Preservation of Documents' under 'Regulation 9' of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The policy shall be effective from 1st day of December, 2015.

2. DEFINITIONS

The words and phrases used in this Policy and not defined here shall derive their meaning from the Companies Act, 1956, the Companies Act, 2013, the Listing Agreement, regulations issued by Securities and Exchange Board of India and any other applicable Law for the time being in force.

3. TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The company shall maintain and preserve documents whether in electronic or physical as specified hereunder:

Category (A): The documents of permanent nature (listed in Annexure A) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company

Category (B): The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in Annexure B) shall be preserved by the Company for the term not less than eight year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

The indicative type of document may include the following:-

1. 'books and papers' as defined in clause 12 of section 2 of the Companies Act, 2013;
2. 'books of accounts' as defined in clause 13 of section 2 of the Companies Act,2013;
3. 'documents' as defined in clause 36 of section 2 of the Companies Act,2013;
4. 'register of company' as defined in clause 74 of section 2 of the Companies Act,2013

4. CUSTODY OF DOCUMENTS

Subject to the Applicable Law, the custody of the Documents shall be with the Company Secretary of the Company. Where the Company Secretary tenders resignation or is transferred from one location of the Company to another, he shall hand over all the relevant documents, lock and key, access control or password, or Compact Disc, other storage devices or such other Documents and devices in his possession under this Policy. The Board may authorize such other person as it may deem fit.

5. REVIEW OF THE POLICY

- a) The Board shall review and amend this Policy as and when requires.
- b) Any subsequent amendment/modification in the Regulation and/or other applicable laws in this regard shall automatically apply to this Policy.

6. INTERPRETATION

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

Annexure A:-Documents whose preservation shall be permanent in nature:

S.No	Nature of Document(s)
1	All documents and Information originally filed with ROC for Incorporation of Company
2	Memorandum of Association and Articles of Association as originally filed and updated from time to time
3	Register of Members
4	Index of Members
5	Minutes of General Meeting
6	Minutes of Board Meeting
7	Minutes of various Committee Meetings
8	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

Annexure B:-Documents with preservation period of not less than eight years after completion of the relevant transactions:

S.No	Nature of Document(s)
1	Books of Accounts
2	Annual Return(s)
3	Register of Debenture holders
4	Index of Debenture holders
5	Statutory Registers
6	Tax related records and documents
7	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time