

**SUVITA REAL ESTATES PRIVATE LIMITED**  
CIN: U45309MH2019PTC332035

**POLICY ON PRESERVATION OF DOCUMENTS**

## **POLICY FOR PRESERVATION OF DOCUMENTS**

*(Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)*

### **INTRODUCTION:**

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") requires every listed entity to have a policy for preservation of documents, approved by its Board of Directors. The Listing Regulations, inter alia, contain provisions for Preservation of Documents and are re-produced as under:

#### ***Regulation 9: Preservation of Documents***

*The listed entity shall have a policy for preservation of documents, approved by its board of directors, 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:*

*Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.*

Accordingly, in compliance to the provision of Regulation 9 of Listing Regulations, the Board of Directors of Suvita Real Estates Private Limited ("**Company**") at its meeting held on 16<sup>th</sup> February' 2024 has approved the Policy on Preservation of Documents.

The Companies Act, 2013 ("**the Act**") and the Rules ("**Rules**") framed under the Act also mandates the Company to maintain various documents including registers and records by the Companies; the place at which such documents are to be maintained and the period for preserving such documents.

Suvita Real Estates Private Limited ("**the Company**") has raised funds by listing its Non - Convertible Debentures ("**NCDs**") on the wholesale debt segment of the BSE Limited.

### **OBJECTIVE:**

The objective of this Policy is to establish a framework for classifying documents, records and registers of the Company for the purpose of preservation of the documents in compliance with the requirements of Listing Regulations, Companies Act, 2013, Companies Act, 1956 (to the extent applicable), Rules framed under the Act and other corporate laws applicable to the Company.

This policy is formulated to manage the Company's information in a structured manner, to retain information for as long as it has a business purpose, to satisfy statutory or regulatory requirements and to protect information which is vital to the Company.

The Company understands the importance of document preservation and has suitably framed the policy to ensure ease of access, retrieval and authentication of records and documents maintained in physical or electronic mode as adopted by the Board.

**EFFECTIVE DATE:**

The Policy is effective from 16-02-2024.

**DEFINITIONS:**

**“Act”** means the Companies Act, 2013 or any previous company law (to the extent the provisions there under are in force) and Rules framed thereunder, including any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.

**“Articles”** means the articles of association of a company as originally framed or as altered from time to time or applied in pursuance of the Act.

**‘Company’** means ‘Suvita Real Estates Private Limited’.

**‘Document’** includes summons, notice, requisition, order, declaration, form 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;

**‘Electronic Form’** w.r.t. information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, microfilm, computer generated micro fiche or similar device in possession of the Company or Company having control over access to it;

**‘Electronic Record’** means electronic record as defined under clause (1) of sub-section (1) of Section 2 of the Information Technology Act, 2000;

**“Maintenance”** means keeping documents, either physically or in Electronic Form;

**“Memorandum”** means the memorandum of association of a company as originally framed or as altered from time to time in pursuance of any previous company law or of this Act;

**“Policy”** means this Policy for Preservation of Documents in accordance with Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

**“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

**“Regulation”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and includes any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.

*[Words and expressions used and not defined herein shall have the meanings as respectively assigned to them in the respective Act / Rules / Regulations]*

**SCOPE AND APPLICABILITY:**

This policy covers all information created, received, managed and retained by the Company including at all its units and divisions, hard copy and electronic records including data on the Internet and Intranet sites, databases and emails.

Information, under this policy, includes all hard copy and digital information created or received in connection with the business of the Company including originals and copies of correspondence,

recordings, work papers, video tapes, photographs, product specifications, reports, emails, web pages, etc.

In the event of any discrepancy arising between an existing rule of law and newly enacted rule, law, regulation, standard etc., such newly enacted law, rule, regulation or standard shall prevail over this Policy from the date of its enforcement until such time this Policy is changed, to conform to the new law, rule, regulation or standard.

#### **PRESERVATION OF DOCUMENTS:**

The preservation of the Documents shall be done in the following manner:

- a) Where any applicable law specifies the period for which a document is required to be preserved, such document shall be preserved for such prescribed period;
- b) where applicable law does not prescribe a requirement for preservation of a document, then such document shall be preserved for such period as the document pertains to a matter; and
- c) in case of any other document, for such period as the relevant officer of the Company handling or dealing with the document decides considering its relevance; provided that generally, a document may be preserved for a period of at least 5 years from the date on which the document was originated.

An indicative list of the Documents and the timeframe of their preservation is provided in **"Annexure- I"**.

#### **DESTRUCTION OF DOCUMENTS:**

The documents specified in **"Annexure-I"** to this Policy, kept by the Company, may be destroyed after the expiration of the period specified in the respective Schedules. The documents not specified in the schedules shall be destroyed after the period of five years.

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.

After expiry of the preservation period as stated in the Policy, the document may be destroyed by recycling, shredding or deleting / destroying electronic data, paper records and documents or such other means as the Board deems fit or to render the confidential paper records as unreadable.

#### **RESPONSIBILITY:**

The concerned departmental/functional head shall be responsible for the maintenance, preservation and destruction of records pertaining to the respective department(s).

#### **POLICY REVIEW / AMENDMENT:**

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant regulation and any change/amendment in the Policy shall be approved by the Board.

**Date: 16.02.2024**

**Place: Mumbai**

**Annexure-I:**

<b>Permanent Preservation</b>	<b>Temporary Preservation (8 years from the date of event)</b>
Documents evidencing registration/ incorporation of the Company/change of name, object etc.	Copies of all Annual Returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto.
Memorandum and Articles of Association of the Company.	Attendance Registers of Board & Committee Meetings.
Statutory Registers under Companies Act, 2013.	Attendance Register of General Meeting.
Annual Reports.	Office copies of Notices and Agenda of the Board Meeting.
Documents relating to issue/allotment of securities (Prospectus, Letter of Offer, Register of Allotment, etc.)	Office copies of General Meeting notices, Scrutinizers report and other relevant papers.
Minutes book of General Meetings.	Contracts entered by the Company from time to time.
Minutes book of Board/Committee meetings.	All notices in form MBP-1 for disclosure of concern/interest received u/s 184 of the Companies Act, 2013 and Rule 9(1) of the Companies (Meetings of the Board and its Power) Rules, 2014.
Various filings made with Registrar of Companies, Stock Exchange(s), Reserve Bank of India or any other statutory authority(ies).	Instrument creating or modifying the charge.
SEBI/ Stock Exchange records including Listing Agreement, Quarterly/ Half yearly/ Annually/ other compliances submitted from time to time, correspondence with statutory bodies.	Books of Accounts of the Company.
Share Transfer, transmission, correspondence with Registrar and Share Transfer Agent.	Tax records- Taxation Documents including documents concerning tax assessment, tax filings, tax returns, proof of deductions, Challans, appeals preferred against any claim made by the relevant tax authorities
Policies/ Codes adopted by the Board of Directors.	HR Documents including records or Documents relating to recruitment, employment and personnel information, remuneration, entitlements, performance review, action taken by or against any employee, complaints by or against any employee.
Approvals / Permissions / Consents/ Licenses for carrying out any Activity/Business received from Statutory Authorities.	Licenses obtained by the Company from statutory authorities.
Legal documents relating to legal cases and litigation including but not limited to contracts, legal opinions, pleadings, Power of Attorneys, Authority Letters, Orders passed by any court or tribunal, Judgments, Interim	Relevant marketing and sales documents.

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.	
Documents relating to any property owned by the Company.	Copy of newspaper advertisement or publications.
Intellectual property Rights documents that are owned by the Company shall include, but not be limited to copyrights, trademarks, patents, and industrial Designs.	Structured Digital Database (SDD)- Every relevant information entered in SDD shall be preserved for 8 years from the date of after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings
Register of investments not held in its own name by the Company.	Register of deposits
Register of loans, investments and guarantees/ securities	Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities, as the case may be)
Any other registers, records, returns, documents as may be required to be maintained by the Company under applicable Laws, Regulations.	