

**ANSAL PROPERTIES &
INFRASTRUCTURE LIMITED**

**POLICY ON PRESERVATION
OF DOCUMENTS**

**{AMENDING THE POLICY DATED
12TH AUGUST, 2017}**

BACKGROUND

Ansal Properties & Infrastructure Limited {including its subsidiaries, affiliates, associate(s), joint venture(s), group company (ies)} (hereinafter referred as the 'Company') believes in the conduct of its affairs in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour and in complete compliance of laws, as amended from time to time.

OBJECTIVES

- Preservation of the existing/future documents of the Company permanently or for specified period/s.
- Destruction of document/s after the specified period of preservation including elimination of all other documents which have outlived their utility, from time to time.
- Documents shall cover those in physical mode as well as in electronic mode.
- To ensure a systematic approach formaintenance and availability of documents in the records of Company as per the requirements of the applicable laws and business prudence.

SCOPE OF THE POLICY

The Policy applies to all the documents in electronic or physical form maintained by the Company and its subsidiaries.

THE LAW

Regulation 09 of SEBI {Listing Obligations & Disclosure Requirements} Regulations, 2015, as amended.

The Company shall have a 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.

DEFINITION OF "DOCUMENT" UNDER COMPANIES ACT, 2013 & OTHERWISE

Document includes summons, notices, requisitions, orders, declarations, forms and registers, whether issued, sent or kept in pursuance of Companies Act 2013 {In short "Act"} or under any other law/s for the time being in force or otherwise, maintained on paper or in electronic form.

- A. Documents shall include those which are mandated to be preserved statutorily.
- B. Documents shall also include those which although not mandated to be preserved statutorily have been, are, or shall be created, maintained and preserved by the Company from time to time, due to its business activities. Specifically, such documents shall include those relating to dealings with the customers of the Company.

PRESERVATION OF DOCUMENTS

Various laws, as amended from time to time, applicable or which shall be applicable to the Company shall be complied in respect of preservation of documents.

All documents of the Company shall be categorised into:-

1. those documents preservation of which shall be permanent in nature meaning thereby preservation shall be as per applicable law/s or till the existence of the Company, and,
2. those documents preservation for which there is no specific legal provision shall nevertheless be preserved for a period of not less than eight consecutive calendar years after the date of completion of the last relevant transaction/s.

An indicative list of various documents of the Company mandated to be preserved under any law/s and various documents of the Company although not mandated to be preserved statutorily shall be preserved due to business activities of the Company is attached herewith marked as **Annexure A**. This list shall be updated from time to time.

All departments of the Company shall ensure that the documents pertaining to their department are preserved as per the Policy. It shall be the duty of the Heads of Department ("HOD") to ensure that they comply with the requirements of the Policy.

PRESERVATION OF LITIGATION DOCUMENTS

Documents arising out of various litigations wherein the Company is a party in any manner, shall be preserved as per the directions/orders of the court/s / tribunal/s/ judicial/ other authority/ies as may be applicable, in absence of which the documents shall be preserved for a period of not less than eight consecutive calendar years after conclusion of the litigation.

DESTRUCTION OF DOCUMENTS

Destruction of the documents after the preservation period shall be done, any time, under the authority, guidance and directions of a Committee consisting of Chief Financial Officer {CFO}, Company Secretary {CS} and any other officer/s as may be decided by the Board of directors {Board}.

A list of such documents shall be prepared before destruction and actual destruction shall be done before the presence of CS & CFO {including any other officer/s, if any} who shall sign such list in token thereof.

It shall be ensured that destruction shall be done in totality and forthwith

Thereafter such list along with a Statement of Destruction by the CEO of the Company shall be placed before the Board for its noting.

A similar process shall also be followed for elimination of all other documents which have outlived their utility.

EXISTING DOCUMENTS

All existing documents of the Company shall be preserved and destroyed in terms of this Policy and the various applicable laws.

DEVIATION FROM THE POLICY

Any Court/ Tribunal / Authority shall have the power to direct the Company to produce /preserve and/or destroy any document/s, however, if any document/s has/ have been destroyed pursuant to this Policy it may not be possible for the Company to produce such document/s, therefore, necessary permission to that effect has to be taken by the Company and/ or a statement to that effect shall be given by the Company to the relevant Court/ Tribunal/ Authority or any other action/s shall be taken as may be advised.

REVIEW

The Board of Directors of the Company shall review the Policy, from time to time, to ensure its effectiveness.

DISCLOSURE

This Policy shall be disclosed in the Company's web site and a web link provided in the Annual Report.



Sushil Ansal
Chairman & Whole Time Director



Date: 12th August, 2021

Annexure A**An indicative list of various documents of the Company to be preserved statutorily and otherwise**

- The Memorandum and Articles of the Company duly signed by all the subscriber to the Memorandum.
- Declaration of compliance with the requirements of the Companies Act, 2013/1956 in respect of registration by the professional for the formation of the Company.
- Affidavit for each of the subscriber to the memorandum and from the persons named as first Director of the Company.
- Register of Charges.
- Register of Members {including Index}
- Register of Debenture holders {including Index}
- Copies of the Annual return filed with the Registrar of Companies
- Minutes of the proceeding of Board and its Committee meetings
- Minutes of the proceeding of General Meeting including resolution passed by Postal Ballot
- Register of Director and Key Managerial Personnel
- Register of Inter-Corporate Loan and Investment
- Register of Company's investment held in Demat form
- Register of Contract or arrangement in which directors are interested.
- Register of other security holders apart from Shares and Debentures.
- Instrument creating a charge or modification thereon.
- Books of accounts and other relevant papers in physical / electronic mode
- Income tax returns, notices, assessment order, appeal documents
- Sale deeds, Lease deeds, Collaboration Agreements, Development Agreements, Settlement Agreements, Sanction Letters, Licences, Approvals, Project Completion Certificates, Layout plans/drawings or other Agreements/papers of the same nature.
- Files containing documents of the customers and those third parties which / who are suppliers, service providers, agents or brokers, contractors, authorities, bankers, investors, financial institutions and all other individuals and/or bodies with which/ whom the Company has subsisting contractual rights and liabilities.