



POLICY FOR PRESERVATION OF DOCUMENTS

BACKGROUND AND APPLICABILITY OF THE POLICY

In term of Regulation 9 of the “SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “**Regulations**”) require every listed Company to formulate a policy on Preservation on Documents which has to be approved by the Board of Directors (“**Board**”).

In this context, the Board of Directors of Manav Infra Projects Limited (“**the Company**”) is required to formulate a policy for “Prevention of documents” to comply with the requirements of Regulation 9 of the Listing Agreement with an objective of classifying various documents, records and registered for the purpose of maintenance and preservation.

The policy can be modified and or amended with the approval of the Board of Directors of Manav Infra Projects Limited.

Accordingly, the Board of Directors of Manav Infra Projects Limited (the “Company”) has adopted this Policy for Preservation on Documents in its meeting of the Board meeting held on October 9, 2017.

DEFINITIONS

“**Board of Directors**” or “**Board**” Board of Directors or Board shall mean the Board of Directors Manav Infra Projects Limited, as constituted from time to time.

“**Company**” Company shall mean “Manav Infra Projects Limited”.

“**Listing Regulations**” Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

“**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

Documents: For the purpose of this Policy the term “**Documents**” shall mean statutory records, registers, returns, forms etc. required to be maintained and preserved by the Company in physical or electronic form under the Companies Act, 1956 / Companies Act, 2013, Securities and Exchange Board of India Act, 1992, Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1996 and includes all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

“**Current**” means running matter or whatever is at present in course of passage.

“**Electronic Form**” means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“**Maintenance**” means keeping documents, either physically or in electronic form.

“**Policy**” or “**This Policy**” means, “**Policy on Preservation of Documents**”.

“**Preservation**” means to keep the documents preventing them from being altered, damaged or destroyed.



“**Register**” means a register maintained under the Companies Act, 2013 or the SEBI Act.

“**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

CLARIFICATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

OBJECTIVE

The Regulations classify the Policy for Preservation of Documents in to two categories:

- i. Documents whose preservation shall be permanent; and
- ii. Documents to be preserved for not less than eight years.

The Documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that documents whether in physical or electronic mode, forms an important and integral part of the Company’s records. The preservation of Documents is important in order to ensure immediate access to the records, its retrieval and authentication.

APPLICABILITY

This Policy is applicable to all Documents maintained in physical and electronic mode by the Company. The Documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

REVIEW OF POLICY

This Policy shall be subject to review as may be deemed necessary and in accordance with any statutory /regulatory requirements.

PRESERVATION PERIOD

The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made; the preservation period of agreements starts with the end of the financial year in which the agreement period expires. For determining the preservation period, the records are categorized into following categories:



Category & Description Period of Preservation Records/documents:

- A. Records which are of short reference value – i.e. : Records, which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc. Less than 8 years
- B. Records/documents required to be maintained as per statutory requirements and having higher reference value – i.e. records having contractual/legal implications, which need to be preserved for a prescribed periods per statutory requirement; and records, which need to be, preserved for a particular period according to Company’s own reference needs. Documents to be preserved for a period of more than 8 years
- C. Records which will have a permanent value for the Company even after the expiry of legal preservation period.
- D. Records which are required for adducing evidence in judicial or quasi judicial or other dispute redressal forum Till the time the matters are finally disposed of.

Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature are preserved according to specific needs and even beyond the prescribed period.

Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government/ Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

PRESERVATION LOCATION

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department.

MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

DESTRUCTION OF RECORDS

The records/documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal.