



VARINDERA CONSTRUCTIONS

POLICY ON PRESERVATION OF DOCUMENTS
OF
VARINDERA CONSTRUCTIONS LIMITED

Construction


Procurement

Engineering

Varindera Constructions Limited (CIN No.: U45201DL1987PLC128579)

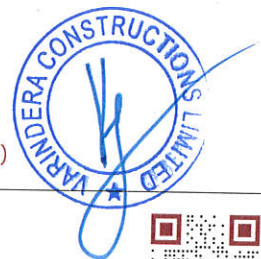
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VARINDERA CONSTRUCTIONS

POLICY ON PRESERVATION OF DOCUMENTS

1. BACKGROUND

The Securities and Exchange Board of India (“SEBI”) vide its notification dated September 2, 2015 issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “SEBI Listing Regulations”) *inter alia* mandate listed entities to frame policy(s) for preservation and archiving of documents.

2. PURPOSE

The purpose of this document is to formulate a policy for preservation of documents in accordance with Regulation 9 of the SEBI Listing Regulations so as to provide a framework for their adequate protection and preservation as per applicable laws.

3. DEFINITIONS

“**Applicable laws**” means securities laws defined under Regulation 2(1)(zf) of the SEBI Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

“**Board**” means board of directors of the Company as constituted from time to time.

“**Company**” means Varindera Constructions Limited

“**Document/s**” includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

“**Policy**” means this Policy on Preservation of Documents formulated by the Company.

4. EFFECTIVE DATE

The Board of Directors of the Company at its meeting held on 28th August 2024 has adopted the policy for preservation of documents (“Policy”) of the Company. The effective date of this policy shall be considered from the date of approval of the Board of the Company.

5. SCOPE

All documents of the Company shall be maintained in compliance with the requirements of the Applicable Laws, including the SEBI Listing Regulations. The preservation of the documents shall be as per the periodicity stated in the guidance manual to the Policy.





VARINDERA CONSTRUCTIONS

6. CLASSIFICATION OF DOCUMENTS

For the purpose of the Policy, the documents of the Company are classified as follows:

- (i) Documents which need to be preserved permanently by the Company (listed in Annexure A) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company.

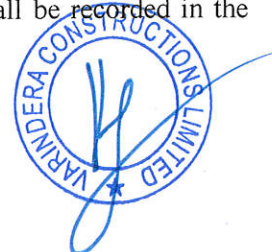
- (ii) Documents with a preservation period of not less than 8 years or the time period stipulated in the SEBI Listing Regulations and other laws and statutes applicable to the Company from time to time after completion of the relevant transactions (listed in Annexure B) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for the said period.

7. MODES OF PRESERVATION

- The Documents may be preserved either in physical form or electronic form.
- The officer(s) of the Company who is / are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person).
- The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure integrity and confidentiality of the Documents and prohibit unauthorised access.
- The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

8. DESTRUCTION OF DOCUMENTS

After the expiry of the retention period, the preserved Documents may be destroyed in such mode as may be recommended by the authorized person and approved by the Managing Director and/or Chief Financial Office of the Company. The details of Documents destroyed by the Company shall be recorded in the





VARINDERA CONSTRUCTIONS

register of disposal of records to be kept by authorized persons who are disposing of the documents in the format prescribed in the guidance manual. This applies to both physical and electronic Documents.

9. REVIEW

This Policy may be reviewed and amended from time to time by the Board, in line with the changing regulatory requirements, or in case the Company faces any practical difficulties in implementing the Policy.

10. COMPLIANCE

All employees of the Company are required to comply with the provisions of this Policy and the guidance manual. Failure to comply by any employee of the Company with this Policy and the guidance may result in disciplinary action by the Company, including suspension or termination of employment.

Any queries regarding this Policy may be referred to the responsible person, who is in charge of administering, enforcing and updating this Policy.

11. INTERPRETATION

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy and procedures.





VARINDERA CONSTRUCTIONS

Annexure A

Records to be preserved permanently

1. Certificate of incorporation
2. Certificate for commencement of business
3. Memorandum and Articles of Association
4. Agreements made by the Company with Stock Exchanges, Depositories, etc.
5. Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
6. Register of Contracts as per Companies Act, 2013
7. Register of Charges as per Companies Act, 2013
8. Register of Investments as per Companies Act, 2013
9. Files relating to premises viz. Title Deeds/ Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10. Authorization / licenses obtained from any statutory authority
11. Policies of the Company framed under various regulations
12. Register of disposal of records
13. Certificates obtained from various statutory authorities
14. Such other records as may be required under any law from time to time
15. Register of Inter Corporate Loans and Investments as per section 186 of the Companies Act, 2013, if applicable .





VARINDERA CONSTRUCTIONS

Annexure B

Records to be preserved for minimum period of eight years

1. Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2. Register of Debenture Holders or any other security holders along with the index from the date of redemption of debentures or securities.
3. Annual Returns as per Companies Act, 2013
4. Register of Deposits as per Companies Act, 2013
5. Register of Allotment (from the date of each allotment) as per Companies Act, 2013
6. Annual financial statements including:
 - Annual accounts
 - Directors report
 - Auditors report
7. Vouchers / Voucher register and books of accounts as defined under subsection 13 of section 2 of the Companies Act, 2013
8. Income Tax Returns filed under Income Tax Act, 1961
9. All notices in form MBP - 1 received from Directors and KMPs alongwith any amendment thereto
10. Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
11. Compliance Reports received from any statutory authority
12. Correspondences made with any statutory authority
13. Register of Power of attorneys, if any
14. Forms and returns filed with RBI/MCA or with any other statutory authority

