

POLICY FOR
PRESERVATION OF DOCUMENTS
AND
ARCHIVAL PROCESS

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PREAMBLE

In terms of the provisions of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), read with Regulation 30(8) of the Listing Regulations, all the listed companies are required to formulate a policy on preservation of documents and archival process thereof.

OBJECTIVE

The Board of Directors of Ravindra Energy Limited (**‘the Company’**) at its meeting held on May 21, 2022 reviewed and has adopted this Policy for Preservation of Documents & Archival Process relating to its Corporate Entity and also various Registers, Forms, Returns, Statements and other Documents pertaining to its various functions and business operations. The Policy also deals with the process of archiving the aforesaid documents.

Preservation of Documents has been a requirement under various statutes, as evidence in a legal process, audit purposes or management requirements. Therefore, the objective of this Policy is to provide a framework for preservation of documents maintained by the Company under various applicable laws, back up the important data and eliminate the possibility of accidental or innocent destruction.

DEFINITIONS

In this Policy unless the context otherwise requires,

“Current Document(s)” means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceeding, compliant, dispute, contract, or any like matter;

“Document” means all papers, files, books of account, certificate, summons, notice, license, requisition, order, declaration, confirmation, evidentiary record, electronic record, electronic mail, instrument, statements, agreements, deeds, permissions, press release, returns, official publication, report, policies, record, form, register, voucher, ledger, minute book, Floppies, CDs, DVDs, Electronic Storage Devices, etc. whether issued, sent or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic mode;

“Electronic mail” means the message sent, received or forwarded in digital form using any electronic communication mechanism that the message so sent, received or forwarded is storable and retrievable;

“Electronic mode” means data sent, received or forwarded is storable and retrievable using electronic medium;

“Maintenance” means keeping document(s), either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such documents;

“Preservation” means to keep in good order; to prevent from being damaged or destroyed;

“Record” means documentary evidence of past events or transactions;

“Register” means a register maintained under the Act and includes registers referred to in this Policy;

“Senior Management” shall mean officers/personnel of the listed entity who are members of its core management team excluding Board of Directors and normally this shall comprise all members of management one level below the Chief Executive Officer/Managing Director/Whole-Time Director (including Chief Executive Officer, in case they are not part of the board) and shall specifically include Company Secretary and Chief Financial Officer.

CLASSIFICATION OF DOCUMENTS

Documents of the Company which are to be preserved are classified into the following categories:

1. Documents which shall be preserved permanently; and
2. Documents which shall be preserved for a period of not less than 8 years from the date of completion of relevant transactions.

Detailed classification of documents to be preserved

Sr. No.	Document Category	Document Type	Preservation requirement	Under the custody of
I.	Corporate/ Organizational	<ul style="list-style-type: none"> • Certificate of Incorporation; • Memorandum of Association; • Articles of Association; • Statutory Licenses, Registrations and Permits; • Permanent Account Number Card. 	Permanent	Company Secretary
II.	Directors/ Key Managerial Personnel/Senior Management	<ul style="list-style-type: none"> • Consent to act as a Director (Form DIR-2); • Notice of disclosure of interests (Form MBP-1); • Intimation of disqualification, if any (Form DIR-8); • Disclosures made under SEBI (Prohibition of Insider Trading) Regulation, 2015; • Resignation Letters; 	Up to eight years from the date of resignation/cessation of the concerned person	Company Secretary

		<ul style="list-style-type: none"> • Service Agreements/Letter of Appointment; • Correspondences with the Directors. 		
III.	Finance & Accounting	<ul style="list-style-type: none"> • Audited Financial Statements and related documents; • Auditors Reports. 	Permanent	Accounts / Finance Head
		<ul style="list-style-type: none"> • Unaudited Financial Statements and related documents; • Books of accounts and vouchers; • Management Letters; • Investment Statements; • Cost Records; • Bank Statements; • Sanction letters and agreements with Banks and financial institution; • Forex transactions; • Income tax Returns; • Tax deduction records; • Records relating to Customs; • Records relating to payment of gratuity; • Details of Related Party Transactions; • Remittance Register; • Fixed Asset Register. 	Up to eight years from the date of document	
IV.	Share & Secretarial	<ul style="list-style-type: none"> • Annual Reports; • Listing Agreement with the Stock Exchange(s); • Tripartite Agreement with the Depositories and the Registrar and Share Transfer Agent (RTA) of the Company; • Agreement with the RTA; • Prospectus; • Documents related to declaration of Interim and Final Dividend; • General Meeting Minute Book; • Board Meeting/Committee Minute Book; • Resolutions passed by the Board/Committee in Circulation and related documents; • Statutory Registers; • Company Policies/Charters/Bye laws; • Secretarial Audit Report and the related documents; • Annual Return and related documents; • Forms (including e-forms), returns and documents including agreements, 	Permanent	Company Secretary

		receipts, undertakings, affidavits with the Registrar of Companies, Regional Director, Ministry of Corporate Affairs, Government of India, Central government and/or any other Statutory Authority(ies);		
		<ul style="list-style-type: none"> • Investor Grievance correspondences; • Correspondences with Statutory Authority(ies); • Records from the RTA; • General Meeting Notices; • Documents relating to Postal Ballots; • Attendance Register; • Leave Register; • Board Meeting/Committee Meeting Notices; • Board Meeting/Committee Meeting Agenda Papers; • Board Presentations; • Certified Extracts from the Minute Book; • Instrument creating a charge including modification and satisfaction thereof; • Newspaper publications. 	Up to eight years from the date of document	Company Secretary
V.	Provident Fund	<ul style="list-style-type: none"> • Records relating to Employees' Provident Fund; • Accounts & Returns submitted to Regional Provident Fund Office; • Electronic Challan Receipts (ECR). 	Eight years	Human Resource Officer or Accounts Head
VI.	Legal	<ul style="list-style-type: none"> • Property Records; • Documents related to the Acquisition and Sale of Property; • Records related to development of intellectual property including Patent, Trademark, Copyright or Trade Secret; • Records of efforts not to Infringe any Patent, Trademark, Copyright or Trade Secret; • Lease and Sale Agreements, Rent Agreements; • Non-Disclosure Agreements; • Contracts, Agreements (unless specifically addressed elsewhere in this policy), Deeds, Licenses; • Documents related to past/ongoing litigations. 	Permanent or as per requirement of law	Legal and Secretarial Team
VII.	Human Resource	<ul style="list-style-type: none"> • Official files of present employees; 	Eight years	Human

		<ul style="list-style-type: none"> • Official files of ex-employees; • Payroll records. • ESOP Documents 		Resource or Accounts Head
VIII.	Insurance	<ul style="list-style-type: none"> • Insurance policies; • Documents relating to Insurance claims, settled and pending. 	Eight years	Accounts Head
IX.	General	<ul style="list-style-type: none"> • Press Releases; • Documents & Agreements with Media Company, PR Agency. 	Eight years	Concerned Departments

ARCHIVAL PROCESS FOR THE DOCUMENTS

The disclosures made to the Stock Exchanges under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be hosted on the website of the Company for a period of five years from the date of its disclosure. Disclosed Information which was over five years old will be archived from the website of the Company for another period of three years by storing the same on suitable media. Anyone intending to review that Disclosed Information may write to Compliance Officer of the Company. Thereafter the said records shall not be destroyed or purged without requisite permission of the respective functional heads who are authorized to preserve such documents.

However, for any disclosure of event which is the subject matter of any ongoing litigation and/or required to be preserved in terms of applicable provisions of Law/Statute, such disclosure shall continue to remain on the website of the Company irrespective of its duration thereat.

DESTRUCTION/DISPOSAL OF DOCUMENTS

- a) Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.
- b) The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice.
- c) The documents mentioned in this Policy, kept by the Company, may be destroyed after the expiry of the minimum retention period. However, in the case of pending matters/ litigation/ disputes, the documents shall be preserved till the resolution of pending matter/ litigation/ dispute. A register of the documents disposed/destroyed shall also be

maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.

- d) The entries in the register shall be authenticated by the Authorised Person(s).

LOCATION OF THE RECORDS

The records shall be maintained at the registered office and other offices maintained by the Company either in physical or electronic form. The overriding principle guiding the choice of location of records is that they will continue to be available to Management on a timely basis.

Keeping in view the secrecy and confidentiality of data the records may be maintained at other offices. Adequate back facility will be made available for electronically stored data.

MONITORING AND EVALUATION OF THE POLICY

This Policy will be reviewed by the Board from time to time and if required, modify the same in order to comply with the statutory requirements and also to incorporate the best industry practices.

POLICY REVIEW

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for approval and noting at a meeting of the Board. Any subsequent amendments/modifications in the Listing Regulations and/or the applicable laws in this regard shall automatically apply to this policy.

DISCLOSURE

The necessary disclosure about the policy, if any, will also be made as per requirements of SEBI LODR Regulations and the Companies Act, 2013.
