



SHRADDHA  
**PRIME**  
PROJECTS LTD.  
CONSTRUCTING VALUE

## Shraddha Prime Projects Ltd.

(Formerly Known As Towa Sokki Limited)

Corporate office : A-309, Kanara Business Centre Premises CS Ltd., Link Road,  
Laxmi Nagar, Ghatkopar (East) Mumbai - 400 075. Tel : 022 21646000

### 1. Preamble:

The Securities and Exchange Board of India (SEBI) has issued and notified "SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Regulations") on 2<sup>nd</sup> September 2015. The Regulations requires the Board of Directors of a Company to frame a Policy for Preservation of Documents classifying them 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

Accordingly, the Board of Directors of **Shraddha Prime Projects Limited (the "Company")** has formulated a policy for "Preservation of Documents" to comply with the requirements of Regulation 9 of the Listing Regulations.

### 2. Effective Date:

This Policy will be applicable to the Company effective 01.04.2022.

### 3. Definitions:

- (i) "Board" Board means "Securities and Exchange Board of India."
- (ii) "Board of Directors" or "Board" means the Board of Directors of **Shraddha Prime Projects Limited**, as constituted from time to time.
- (iii) "Company" shall mean "**Shraddha Prime Projects Limited**"
- (iv) "Documents" Documents means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.





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(v) "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.

(vi) "Listing Regulations" Listing Regulations means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

#### 4. Objective:

This Policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A. The documents of a permanent nature (listed in **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.
- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure - 2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided further that the Company may keep the documents as specified above in an electronic mode.

#### 5. Mode of Preservation of Documents:

The documents specified in Point No. 3 shall be kept in Electronic Mode and/or Physical Mode as decide by the Board of Directors from time to time.





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### 6. General:

Notwithstanding anything contained in this Policy, the Company shall ensure to comply 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.

### 7. Destruction of Documents:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s) / Board of Director. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate /unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

### 8. Amendments to the Policy:

The Board of Directors on its own can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.





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### Annexure 1

#### Indicative List of Documents whose preservation shall be permanent in nature:

- 1) Common Seal
- 2) Memorandum and Articles of Association as amended from time to time
- 3) Minutes books of Board, General Meetings and Committee Meetings
- 4) Resolutions passed by Circulation
- 5) Statutory Registers
- 6) Register of Members including an index of the names
- 7) Registration Certificates, Licenses & Statutory Approvals
- 8) Audited financial statements
- 9) Material Agreements/Contracts
- 10) Orders issued by courts / statutory bodies





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### Annexure 2

**Documents with preservation period of not less than eight years after completion of the relevant transactions or financial year:**

1. Books of Accounts including vouchers relevant to any entry in such books of account
2. Disclosures/ Notices by a director of his/her interest
3. Board Agenda and supporting documents
4. Office copies of Notice of General Meeting and related papers
5. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
6. Annual Return(s)
7. Insurance Policies/ Claims under various policies
8. Correspondences with Departments/shareholders
9. Non- Statutory Registers/Documents
10. Legal Documents / Contracts / Tax Records
11. Any other document as may be required to maintain in terms of applicable law (s), maintained and preserved from time to time.

