

Policy for Preservation of Documents

I. Preface and objective

Keystone Realtors Limited (the “**Company**”) is committed to being open and transparent with all stakeholders and believes in disseminating information in a fair and timely manner. The Board of Directors of the Company in pursuance of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI Listing Regulations**”) and other applicable provisions (including any statutory enactments/amendments thereof), adopted the following policy for preservation of documents (“**Policy**”) classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode. Further Regulation 30 (8) of the SEBI Listing Regulations refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website. Besides the above, as per applicable provisions of Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

In accordance with the above Regulation 9, Regulation 30 (8) and the provisions of the Companies Act, 2013, and other applicable provisions of law the Company has framed the Policy is framed in line with the existing provisions of the SEBI Listing Regulations and the Companies Act, 2013. Any future changes in the SEBI Listing Regulations will, *ipso facto*, apply to this Policy. The Policy has been approved by the Board of Directors on June 03, 2022.

II. Definitions

“Archival” means accumulation/storage of historical records on server/network or at a physical place.

“Board of Directors” or **“the Board”** means the Board of Directors of Keystone Realtors Limited, as constituted from time to time.

“Documents” or **“Records”** mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company.

“Preservation” or **“preserve”** means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.

“Listing Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, together with the circulars issued there under, including any statutory modifications or re-enactments thereof for the time being in force.

III. Effective date

The Policy shall come into force with effect from the date Regulation 9 of the SEBI Listing Regulations takes effect with respect to the Company.

IV. Documents to be preserved

This Policy sets the standards for preservation of documents of the Company, broadly classified in the following categories, which may be preserved, in physical and/or electronic mode.

(i) **Category A – Documents whose preservation shall be permanent in nature**

Annexure 1 of this Policy contains the details of documents whose preservation shall be permanent in nature. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- (ii) **Category B - Documents to be preserved for not less than eight years after completion of therelevant transaction.**

Annexure 2 of this Policy contains the details of documents with preservation period of not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

- (iii) **Category C - General**

In addition to the documents mentioned in sub-clause (i) and (ii) above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing rules/ procedures/ practices of the Company or as per the applicable statutory/ regulatory provisions in this regard.

Annexure 3 attached herewith contains the details of documents with preservation period other than those mentioned in sub-clause (i) and (ii) above.

- (iv) **Category D - Documents to be made available on the website of the company as required by theCompanies Act, 2013 and the SEBI Listing Regulations**

a) The Company shall maintain a functional website containing:

- The basic information about the Company,
- All information and/or documents as specified in the applicable provisions of Companies Act,2013,
- All information and/or documents as specified in Regulation 46 (2) of the SEBI ListingRegulations,
- All information and/or documents mentioned in Part (B) of Annexure 2 of this Policy, which arerequired to be made available on the website of the Company, and
- All information and/or documents as mentioned in Regulation 30 of the SEBI Listing Regulationson material events.

- b) The Company shall ensure that contents of the website are correct.
- c) The Company shall update any change in the content of its website within two working days from the date of such change in content.
- d) Information and/ or documents required to be made available under Regulation 30 of the SEBI Listing Regulations shall be made available on the website simultaneously with disclosure to stock exchanges.
- e) The information and/or documents relating to all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of company for a minimum period of five years.
- f) Information and/ or documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz.
 - The information and/or documents shall be arranged financial year wise with further segregation into four quarters of the financial year.

All policies etc. or the information/ documents of a general nature shall be clubbed together at one place.

V. Responsibility

The heads of respective departments of the Company shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.

VI. Mode of maintenance

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company.

All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under applicable law.

For all physical as well as electronic Documents, the heads of the respective business divisions/ departments of the Company shall be responsible for preservation of such Records, Documents. The preservation of the records should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the records. The preserved records must be accessible at all reasonable times. Access may be controlled by the heads of the respective business divisions/ departments with preservation, so as to ensure integrity of the records and prohibit unauthorized access.

VII. Destruction of documents

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/ concerned Functional Director/ Head of the Department. This applies to both physical and electronic documents.

After the expiry of time mentioned in Clause 3 (iv) (e) of this Policy, the information and/or document shall be removed from the main website. The backup of such information and/or document which is removed from the main website shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years the backup may be permanently removed from the server.

VIII. Dissemination of the Policy

The Policy, as amended from time to time, shall be placed on the website of the Company,

IX. 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.

X. Policy review

The board of directors of the Company ("**Board**") may subject to applicable laws is entitled to amend, suspend or rescind this Policy at any time. Any difficulties or ambiguities in the Policy will be resolved by the Board of Directors in line with the broad intent of the Policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy.

In the event of any conflict between the provisions of this Policy and of the applicable law dealing with therelated party transactions, such applicable law in force from time to time shall prevail over this Policy.

Annexure - 1

Documents preservation of which is permanent in nature

Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1	Copies of all documents and information as originally filed under section 33 (incorporation) of the Companies Act, 1956	Registered office	Company Secretary or any other person authorized by the Board for the purpose	Sec 7(4) of the Companies Act, 2013	Permanent, Till dissolution Of the company
2	Register of Renewed and Duplicate Share Certificates in Form SH-2	Registered office of the company or at such other place where the Register of Members is kept	Company Secretary or any other person authorized by the Board for the purpose.	Rule 6 (3) of Companies (Share Capital and Debenture) Rules, 2014	Permanent
3.	Share certificate forms and related books and documents Disputed cases	Registered office	Company Secretary or such other person as the Board may authorize	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	Permanent

4.	Register of Charges in Form CHG-7	Registered office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	Permanent
5.	Register of Members, as Maintained by a depository under section 11 of the Depositories Act, 1996	Maintained by a depository	Maintained by a depository	Rule 15(1) of the Companies (Management and Administration) Rules, 2014 read with section 88 of the Companies Act	Permanent
6.	Minutes books of general meetings	Registered Office	Company Secretary or any director duly authorized by the Board for the purpose	Rule 25(1)(e) of the Companies (Management and Administration) Rules, 2014	Permanent
7.	Minutes books of the Board and committee meetings	Registered office or such place as Board may decide	Company Secretary or any director duly authorized by the Board for the purpose	Rule 25(1)(f) of the Companies (Management and Administration) Rules, 2014	Permanent
8.	Register in form MBP-2 u/s 186 of the Companies Act, 2013 (loan/	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 12(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent

[illegible]

Note: Property records including purchase and sale deeds, licences, copyrights, patents & trademarks shall also be preserved permanently.

Annexure – 2

Documents with preservation period of not less than eight years after completion of the relevant transactions

A) Mandated under Companies Act, 2013

Sl. No.	Document	Place of preservation	Person responsible for custody	Reference provision	Period
1.	Instrument creating charge or modification thereon	Registered Office	Company Secretary or if there is no company secretary, any director or any other officer authorised by the Board for the purpose.	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	8 years from the date of satisfaction of charge by the company
2.	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto	Registered Office	Company Secretary	Rule 15 (3) of the Companies (Management and Administration) Rules, 2014	8 years from the date of filing with the Registrar of Companies.

3.	All notices in Form MBP-1 for disclosure of concern/interest received u/s 184 of the Companies Act, 2013 and Rule 9(1) the Companies (Meetings of Board and its Powers) Rules, 2014	Registered Office	Company Secretary or if there is no company secretary, any director or any other officer authorised by the Board for the purpose.	Rule 9(3) of the Companies (Meetings of Board and its Power) Rules, 2014	8 years from the end of the financial year to which it relates
4.	The attendance register of Board & Committee Meetings	Registered Office	Company Secretary or if there is no company secretary, any director or any other officer authorised by the Board for the purpose.	4.1.6 & 4.1.7 of Secretarial standards -1	8 financial years from the date of last entry made therein and may be destroyed thereafter with the approval of the Board.
5.	Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the company	Registered Office	Company Secretary or if there is no company secretary, any director or any other officer authorised by the Board for the purpose.	8.2 of Secretarial Standards-1	As long as they remain current or for 8 financial years whichever is later and may be destroyed thereafter with the approval of the Board

6.	Office copies of general meeting Notices, scrutinizers report and other related papers of the company	Registered Office	Company Secretary or if there is no company secretary, any director or any other officer authorised by the Board for the purpose. Authorised by the Board for this purpose	18.2 (Secretarial Standards-2)	As long as they remain current or for 8 financial years whichever is later
7.	Any other register / documents required by any law, for the time being in force	Registered Office	Company Secretary		8 financial years
8.	Books of Accounts	Registered Office	CFO		8 financial years
9.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means	In the company	Company Secretary or any other person authorised by the Board for the purpose	Rule 22 (11) of the Companies (Management and Administration) Rules, 2014	8 financial years

B) Illustrative list of Documents identified under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 apart from Documents mentioned in Annexure 1 & Annexure 2 (Part A)

Sl. No.	Document	Provision	Regulation no.	Period
1	Compliance certificate (for compliance of Reg. 7(2) signed by compliance officer & share transfer agent)	within one month of end of each half year	7(3)	8 financial years
2	Statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.	within twenty one days from the end of each quarter	13(3)	8 financial years
3	Quarterly compliance report on corporate governance	within fifteen days from close of the quarter.	27(2)	8 financial years
4	Prior intimation to stock exchange about the meeting of the board of directors	Within the time prescribed	29	8 financial years
5	Disclosure of any material event or information	Within the time prescribed	30	8 financial years*
6	Statement showing holding of securities and shareholding pattern separately for each class of securities	on a quarterly basis, within 21 days from the end of each quarter	31	8 financial years
7	Statement of deviation(s) or variation(s) in the use of proceeds from the objects stated in the offer document or explanatory statement to the notice for the general meeting, for public issue, rights issue,	Within the prescribed time on a quarterly basis	32	8 financial years

	preferential issue etc.			
8	Quarterly and year-to-date standalone/ consolidated financial results	Within 45 days from the close of quarter, other than last quarter	33(3)(a)	8 financi alyears
9	Annual Audited standalone/ consolidated financial results along with the results of the last quarter	Within 60 days from the end of financial year	33(3)(d)	8 financi alyears
9	As part of financial results for the half year by way of a note a statement of assets and liabilities as at the end of the half-year	along with quarterly Financial Results	33(3)(f)	8 financi alyears
10	Annual report	not later than the day of commencement o f dispatch to its shareholders	34	8 financi alyears
11	Annual Information Memorandum	in the manner specified by the Board from time to time	35	8 financi alyears
12	a certificate from a practicing company secretary, certifying that all certificates have been issued within thirty days of the date of lodgement for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/ allotment monies.	within one month of the end of each half of the financial year	40(9)	8 financi alyears

13	Intimation of record date	Notice in advance of at least seven (3) working days in case of right issue) working days (excluding the date of intimation and the record date) to stock exchange	42	8 financial years
14	Details regarding the voting results of general meetings	within forty eight hours of conclusion of its General Meeting,	44	8 financial years
15	Any and all kinds of filing to Stock Exchanges, viz. Press Release, Investors Presentation, etc.	Within the time prescribed	-	8 financial years

**However the disclosures under Regulation 30 shall be hosted on the website for a minimum period of five years.*

Annexure - 3

Documents with preservation period as mentioned in last Column of each entry

Sl. No.	Document	Person responsible for custody	Reference of provision	Period
1.	Share certificate related books and documents (other than disputed cases)	Company Secretary or director duly authorised by the Board for the purpose.	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	30 years
2.	Share certificates surrendered to company immediately be defaced by stamping or printing the word "cancelled" in bold letter)	Company Secretary or any other person authorised by the Board for the purpose.	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	3 years from the date on which they were surrendered and may be destroyed thereafter
