



POPULAR ESTATE MANAGEMENT LIMITED
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POLICY ON PRESERVATION OF DOCUMENTS

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1. PREFACE

In terms of Regulation 9 of Listing (Obligations and Disclosures Requirements) Regulations, 2015 (“Regulations”), as mentioned below, the Company is required to frame an archival policy:

“The listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

(a) documents whose preservation shall be permanent in nature ;

(b) documents with preservation period of not less than eight years after completion of the relevant transactions;

“Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode”

In this context the policy on preservation of documents has been framed.

2. PURPOSE

This policy has been framed to abide by the Regulation 9 of Listing (Obligations and Disclosures Requirements) Regulations, 2015 (hereinafter referred as “the Regulations”)

3. DEFINITIONS

- a) **Act:** means the Companies Act, 2013 including any amendment or modification thereof.
- b) **Board:** Board means Board of Directors of the Popular Estate Management Limited (hereinafter referred as “POPULAR” or “the Company”).
- c) **Company:** means **POPULAR ESTATE MANAGEMENT LIMITED.**
- d) **Compliance Officer:** "Compliance Officer" means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- e) **Document:** “Document” means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- f) **Employees:** “Employees” shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.
- g) **Key Managerial Personnel:** “Key Managerial Personnel” shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.
- h) **Regulations:** “Regulations” shall mean SEBI [Listing Obligations and Disclosure Requirements) Regulations 2015.

Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

4. **RESPONSIBILITY**

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to Respective Department.

Documents	Authorized Person
Tax / Accounting Records	CFO / Sr. Account officer (Accounts)
Financial Statements / Minutes / Statutory Registers, Return / MOA & AOA etc.	Company Secretary & Compliance Officer
Employment / Personal Records	HR Manager & Staff /Depart. Head
Legal Documents and Intellectual Property and Trade Secrets	Company Secretary & Legal Department
Electronic Mails	Individual respective sections / IT Department

5. **POLICY REVIEW**

The policy will be reviewed periodically by the Top Management of the company and amendments will be effected to subject to approval of the Board if and when practical difficulties are encountered. The Top management may also review this policy on document preservation considering compliance requirements under any local, state, central legislation that may be formulated from time to time.

6. **PRESERVATION OF DOCUMENTS**

Popular Estate Management Limited shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made there under, the Secretarial Standards, the Listing Agreement and the Regulations and any other law, rules, regulations as may be applicable to the Company either physically or electronically, from time-to-time.

7. **DESTRUCTION OF RECORDS**

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

8. **PRESERVATION PERIOD**

For determining the preservation period the documents are categorized as follows

CATEGORY AND DESCRIPTION	PRESERVATION PERIOD
Corporate records (certificate of business, listing agreement, minutes book of the board, general meeting and committees thereof, annual reports originals, statutory registers to be maintained under Companies Act and SEBI regulations etc.	Permanent
Annual Audit Reports and Financial Statements	8 years
ROC filling and Stock Exchange filling in physical and Electronic Form	8 years from date of filling
General Ledger	8 years
Investment Records	8 years

Insurance Claim files	8 years
Income Tax Returns	8 years
Service Tax Records	8 years
License & approval	8 years
Court Orders	8 years
Employee pay roll records	8 years
Research & development	8 years
Tax bills, receipts	8 years
Contract related correspondents	8 years

9. **SUSPENSION OF RECORD DISPOSAL**

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise.

10. **AUTHORITY FOR APPROVAL OF POLICY**

The Board shall have the authority for approval of this policy in pursuance to this Regulation.

11. **AUTHORITY TO MAKE ALTERATIONS TO THE POLICY**

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

12. **EFFECTIVE DATE**

The policy will be effective with effect from the date of approval by the Board.

13. **DISCLAIMER**

Nothing contained in this Policy shall operate in derogation of any law for the time being in force or of any other regulation in force.

In any circumstance where the terms of this Policy differ from any applicable law governing the Company, such applicable law will take precedence over this Policy and procedures until such time as this Policy is modified in conformity with the Applicable Law.

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