

SHOQUBA REALTY PRIVATE LIMITED
(CIN: U68100MH2024PTC426680)

POLICY ON PRESERVATION OF DOCUMENTS

1. BACKGROUND

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 / records maintained by the Company either in physical mode or in electronic mode.

Since the Company is debt listed, this policy is being adopted.

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

Terms not defined in this Policy shall have the same meaning as assigned to them under the Companies Act, 2013, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and other applicable laws.

“**Act**” means the Companies Act, 2013.

“**Applicable Law**” means any law, rules, circulars, guidelines or standards issued by Securities and Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

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

“**Company**” means Shoquba Realty Private Limited.

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

“**Record**” shall include the following but not limited to:

- Accounting and Finance records including Annual Financial statement
- Insurance Records

- Tax records
- Contracts entered into by the Company including Marketing Contracts
- Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities
- Legal Files and Records
- Property Records
- Payroll Records
- Pension and retirement related Records
- Personnel and HR Records
- Programs & Service Records
- Corporate Social Responsibility Records
- Correspondence and Internal Memoranda
- Electronic Documents including email retention and back up
- Miscellaneous Records
- Business Agreements
- Brands and Patents records

“Electronic Form” with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, microfilm, computer generated micro fiche or similar device;

“Maintenance” means keeping documents, either physically or in electronic form.

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

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

“Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosures Requirement) Regulations , 2015.

4. SCOPE

All documents of the Company shall be maintained in compliance with the requirements of the Applicable Laws, including the SEBI Listing Regulations. The documents and records shall be preserved as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the SEBI Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to-time.

The Major objectives of the policy are:

- Identification of statutory registers and other records of the Company which are required to be preserved.

- Identification and categorization of the statutory registers and other records to be maintained either for eight years or permanently.
- Decide whether the statutory records and documents are to be preserved in physical or electronic form.
- After completion of the 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the policy or as decided by the Board of Directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

5. 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 subject to the modifications, amendments, additions, deletions or any changes made therein from time to time as referred in **Annexure A**.

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 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 subject to the modifications, amendments, additions, deletions or any changes made therein from time to time, as referred in **Annexure B**. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for the said period. This is currently eight (8) years.

6. 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). This is more particularly as set out in the guidance manual.
- 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, in line with applicable cyber security and data retention standards.

7. 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 Board of the Company. The details of Documents destroyed by the Company shall be recorded in the 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.

8. 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.

9. 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 person responsible, who is in charge of administering, enforcing and updating this Policy.

10. INTERPRETATION

The Board shall review and amend this policy as and when required. 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.

[This policy is approved by the Board as on 11th February 2025]

ANNEXURE A

Documents whose preservation shall be permanent in nature

Sr. No.	Particulars
1.	Incorporation documents
2.	Constitutional documents
3.	Minutes Books of the Board, General Meetings and committee Meetings, if any.
4.	Statutory Registers
5.	Statutory Forms and disclosures except for routine compliance
6.	Licenses and permissions
7.	Policies framed as per relevant applicable law
8.	Annual Returns

ANNEXURE B

Documents whose preservation shall be not less than eight (8) years

Sr. No.	Particulars
1.	Attendance Register of Board/General Meeting
2.	Any other register /documents required by any law, for the time being in force
3.	Income tax papers
4.	Office copies of Board Meeting Notices, Agenda, notes on agenda and other related papers
5.	Documents of Human Resource department as per relevant applicable law
6.	Disclosure of interest by the Directors
7.	Disclosures prescribed under SEBI (LODR) Regulations, SEBI (PIT) Regulations, SEBI (SAST) Regulations
8.	Instrument creating a charge or modification
9.	Books of accounts and financial statements etc.
10.	Any other important documents including tax filling and papers, project documents and any other such documents and papers.