



Policy for Archive, Preservation and Disposal of Documents

Corporate Office

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1. INTRODUCTION

Arkade Developers Limited (“The Company”) is respected in the industry for its professional style of management and best business and professional practices, its core values based on Customer Focus, Integrity, Teamwork, Passion for Excellence and Accountability with an objective of achieving transparent business governance, regulatory compliance and ultimately to enhance shareholders’ value. The Company believes that good governance generates goodwill among business partners, customers and investors, earns respect from society, brings about a consistent sustainable growth for the Company and generates competitive returns for the investors. Timely disclosure of relevant information and preservation of the same for future reference, are two key elements for stakeholders to make informed decisions.

Document preservation is meant to serve the information and record management needs of a business, to comply with the regulatory requirements and to provide adequate and timely information to the stakeholders. The organization, storage, retention, and easy retrieval of business records help a company's business operations and preserve its valuable information assets, its institutional knowledge, experience, business methods and practices. The principle of document retention is to preserve useful documents permanently or for the limited period of time during which their retention is useful or required by law to ensure corporate compliance with statutory and regulatory document retention rules and requirements.

The Company makes this Policy for Archive, Preservation and Disposal of Documents in compliance with the provisions of Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI Listing Regulations) with the main objective to establish guidelines for the Company for preservation and archival of documents and orderly disposal of documents of the Company covered under this Policy.

2. EFFECTIVE DATE

This Policy is effective 18th August, 2023.





3. DEFINITION

“**Companies Act**” or “**Act**” shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“**Board of Directors**” or “**Board**” means the Board of Directors of the Company.

“**Company**” means Arkade Developers Limited.

“**Document**” means any register, record or other document mandatorily required to be maintained by the Company as per the provisions of the Companies Act, the Securities and Exchange Board of India Act, 1992 including any statutory modification and amendments or re-enactments thereof or under any other law for the time being in force whether maintained physically or electronically.

“**Policy**” means this Policy for Archive, Preservation and Disposal of Documents.

“**SEBI Listing Regulations**” mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

“**SEBI**” means the Securities and Exchange Board of India.

“**SEBI Regulations**” means the regulations made by SEBI in accordance with the Securities and Exchange Board of India Act, 1992 (the SEBI Act).

Any other term not defined under these presents shall have the same meaning as defined in the Companies Act, 2013 or the rules made thereunder, the SEBI Act or the SEBI Regulations.

4. APPLICABILITY

This policy shall apply to all the documents that are required to be maintained and preserved under the applicable provisions of the Act, the SEBI Act, the SEBI Regulations and any other acts, rules and regulation for the time being in force.





5. STATEMENT OF POLICY

All the documents required to be maintained by the Company are broadly categorized as:

- a. Documents to be preserved permanently, an indicative list of which is set out in Part A of Annexure I; and
- b. Other documents, that has documents with preservation period of not less than eight years after completion of the relevant transactions An indicative list of which is set out in Part B of Annexure I.
- c. Subject to applicable laws, all statutory records and all the documents set out in Part A of Annexure I shall be preserved permanently.
- d. Statutory and regulatory documents that are required to be maintained and preserved for a period specified under the relevant statute, shall be maintained at least for the prescribed duration.
- e. All other documents, as set out in Part B of Annexure I shall be preserved for at least five (5) years or for such period as may be mentioned in the relevant law, whichever is longer.
- f. All the documents, records that are statutorily required to be hosted on the website of the Company as per SEBI regulations or other applicable law, shall be hosted on the website for a minimum period of five (5) years or for such period as may be mentioned in the relevant law, whichever is longer.

6. DISPOSAL OR DESTRUCTION OF THE DOCUMENTS

All the registers, records, documents, covered under this policy, may be destroyed after the expiration of the applicable preservation period and the Company shall maintain a register entering the details of destroyed documents and the entries made therein shall be authenticated by the Secretary or any other person as may be authorized by the Board for this purpose. The list of registers, records, documents destroyed, in accordance with this policy, shall be placed before the Board, within 4 months of such destroyal, for its information. Any disposal of registers, records, documents, which is not in accordance with this policy, shall be subject to prior approval of the Board.





7. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.





Annexure I

Part A

Following documents shall be preserved permanently:

A. Documents under the Companies Act, 2013

1. Memorandum and Articles of Association as amended from time to time;
2. Certificate of Incorporation;
3. Certificate of Commencement of Business;
4. Register of Contracts;
5. Register of Directors and KMPs and the securities held by them;
6. Register of Loans and Investments made by the Company;
7. Register of Index and Members;
8. Minutes of the Board, Committees of the Board, General Meetings including meetings conducted through Postal Ballot;
9. Resolutions passed by circulation;
10. Various forms and returns filed with the authorities;
11. Audited Financial Statements;
12. Excise Returns, Income Tax Returns, Sales Tax Returns, Service Tax Returns;
13. Order issued by Courts/ Statutory Bodies;
14. All acquisitions and merger related papers.





B. Documents under SEBI Listing Regulations

15. Listing Agreement executed with the Exchange;
16. Trading approval relating to listing of securities;
17. Offer documents for Public issue and private placement of securities filed with SEBI.

C. Documents under Depositories Act

18. Confirmation of all Corporate Actions with respect to allotment of securities;
19. Intimation on allotment of ISIN for securities issued.

Part B

Other documents which the Company shall maintain:
Companies Act, 2013

1. Register of Buy-Back of securities from the date of completion of Buy-Back;
2. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballot;
3. Notices pertaining to disclosure of Interest by the Directors;
4. Annual Returns with annexures;
5. Register of Charges;
6. Register of Debentures;
7. Books of Accounts including vouchers and bills;
8. Register of members;
9. Register of transfer and transmission of shares;
10. Register of renewed and duplicate certificates;



CIN: U45200MH1986PLC039813



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(Formerly known as Arkade Developers Pvt. Ltd.)

11. Documents relating to appointment of Managerial Personnel;
12. Dividend reconciliation statement till the time the dividend is transferred;
13. Scrutinizers Report on AGM and Postal Ballot.

B. SEBI Listing Regulations

1. All reports filed with the Stock Exchange from time to time;
2. Disclosures of various events and press releases;
3. Intimations of Board Meetings.

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