

POLICY ON PRESERVATION OF DOCUMENTS

Preamble:

As per Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "SEBI Listing Regulations"), a listed entity is required to have a policy for preservation of documents, approved by the board of directors, classifying them in at least two categories viz.-

- (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

Such documents may be kept in an electronic mode. The Companies Act 2013 along with Rules framed thereunder and SEBI Listing Regulations have prescribed certain registers, returns and records to be preserved by a company.

Policy:

Taking into account the aforesaid provisions and other applicable legal provisions, the Policy on Preservation of Documents ("Policy"), to the extent applicable to the Company, is being made as under:

1. Documents whose preservation shall be permanent in nature as per **Annexure-A**;
2. Documents with preservation period of not less than eight years after completion of the relevant transactions, as per **Annexure-B**.
3. The documents referred to above may be maintained in physical or electronic mode.
4. Custody of all such Registers / Records / Documents, except books of accounts, shall be with the Company Secretary of the Company or such other person as may be specifically authorised by the Board of Directors for the purpose. Custody of books of accounts shall be with the Chief Financial Officer of the Company or such other person as may be specifically authorised by the Board of Directors for the purpose.
5. Back-up of the records maintained in electronic mode may be taken on a periodic basis.
6. The documents after the expiry of the stipulated period for preservation, may be destroyed / extinguished with approval from the Chairman or Managing Director or any other Wholetime Director/Executive Director and a register shall be maintained in an appropriate form, in physical or electronic mode, wherein brief particulars of the documents destroyed shall be entered.
7. The Chairman is authorised to make appropriate changes to the above policy and decide on the period for preservation for various other documents based on the law for the time being in force.
8. This Policy is subject to review from time to time.

For Bajel Projects Limited

Sd/-
Chairman

Place: Mumbai

Date: 06th June 2023

ANNEXURE A

Documents whose preservation shall be permanent in nature

- i) Register and Index of Members
- ii) Minutes of Meetings of Board of Directors, Committees of Board of Directors and Shareholders
- iii) Register of Loans and Investments
- iv) Register of Charges
- v) Register of renewed and duplicate certificates
- vi) Register of Contracts or Arrangements in which directors are interested
- vii) Register of Investments not held in Company's name
- viii) Register of Director and Key Managerial Personnel & their shareholdings ix) Such other Registers / Records, as may be prescribed from time to time, required to be maintained permanently.

ANNEXURE B

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

- i) Register and Index of Debenture holders
- ii) Copies of Annual Returns filed with the Registrar /Ministry of Corporate Affairs
- iii) Books of Accounts including Tax Records
- iv) Copies of Notices, Agenda, Notes on Agenda and other related papers
- v) Register of Directors' Attendance
- vi) Register of Deposits
- vii) Register of Members present
- viii) Register of Proxies
- ix) Register of Transfer and Transmission
- x) Copy/ies of instrument(s) creating / modifying charge(s)
- xi) Register of Common Seal
- xii) Notice of disclosure of interest from Directors and Key Managerial Personnel
- xiii) Such other Registers / Records, as may be prescribed from time to time