

## PRAJ INDUSTRIES LIMITED

### POLICY FOR PRESERVATION OF DOCUMENTS

<b>Versions of the policy</b>			
<b>Sr. No.</b>	<b>Particulars</b>	<b>Board approval date</b>	<b>Effective date</b>
1.	Initial adoption	29 <sup>th</sup> October, 2015	29 <sup>th</sup> October, 2015
2.	1 <sup>st</sup> amendment	29 <sup>th</sup> January, 2016	29 <sup>th</sup> January, 2016
3.	2 <sup>nd</sup> amendment (current version)	5 <sup>th</sup> November, 2025	5 <sup>th</sup> November, 2025

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## 1. PREFACE:

The Board of Directors (the “**Board**”) of Praj Industries Limited (the “**Company**”), has approved and adopted the Policy for preservation of Documents /Records (“the **Policy**”) maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the **Documents**”). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the **Listing Regulations**”).

## 2. PURPOSE OF THE POLICY:

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

## 3. DEFINITIONS:

“**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

“**Electronic Records**” means the electronic record as defined under clause(t) of subsection (1) of section 2 of the Information Technology Act, 2000.

“**Electronic Form**” means on any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over or access to it.

“**Maintenance**” means keeping Documents, either physically or in Electronic Form.

## 4. ADMINISTRATION:

The Compliance Officer of the Company (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

## **5. PRESERVATION OF DOCUMENTS:**

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to-time. All original documents like permits, licenses, property title documents, Joint Venture Agreements etc. shall be retained by respective Function Heads and shall ensure safe custody of these documents.

### **A. Documents which are to be maintained permanently: (Annexure I)**

- a) Certificate of Incorporation, Certificate for commencement of business
- b) The Original signed and stamped Memorandum of Association
- c) Articles of Association along with extracts of all special resolutions passed and resolutions relating to the appointment and remuneration of Managing Director as per Section 192 of the Companies Act, 1956 and Section 117 of the Companies Act, 2013.
- d) Register of members commencing from the date of the registration of the company, Index of members, Register of Share Transfers, Register of Contracts, Register of Charges, Registers of investments in securities not held in the name of the Company, Register of loans, guarantee, security and acquisition, Registers of Renewed and duplicate share certificates and Register of Directors and KMP.
- e) Minutes of General Meetings, Board Meetings and various Committee Meetings
- f) Agreements made by the Company with Stock Exchanges, Depositories, etc.
- g) Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.

### **B. Documents which are to be maintained for at least eight financial years: (Annexure I)**

- a) Books of account together with the vouchers relevant to any entry in such books of account
- b) Annual Returns
- c) Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
- d) Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be
- e) Employment /Personnel Record in case of employees of the Company

- f) Legal documents including but not limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters

## **6. 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.

All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

Concerned Function Head shall be responsible for preparation as well as maintenance of required documents, records etc. pertaining to his/her function. Compliance Officer shall ensure that required document has been preserved for period mentioned in the relevant Act/Statute.

## **7. DISPOSAL AND DESTRUCTION OF RECORDS:**

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents. The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Company Secretary or Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved.

The categories of Documents may be destroyed as normal administrative practices are listed in **Annexure – II**.

This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.

## **Annexure II**

- Brochures
- Copies of press cuttings, press statements or publicity material
- Letters of appreciation or sympathy, or anonymous letters
- Request for copies of maps, plans, charts, advertising material
- Telephone message
- Drafts of reports, correspondence, speeches, notes, spread sheets, etc.
- Routine statistical and progress reports compiled and duplicated in other reports
- As per the SEBI Regulations (Regulation 9), all the disclosures made by the company to the stock exchanges shall be also hosted on the company's website for a minimum period of 5 years where after they can be destroyed with the approval of the Board
- Facsimiles where a photocopy has been made.

Concerned Function Head shall be responsible for disposal / destruction of the relevant documents, records etc. pertaining to his/her function as per applicable statutory provisions. Further, Authorised Person shall make entry in the Register (format mentioned in Annexure A) after disposal or destruction of record.

### **Register of Documents destroyed:**

A register of the Documents disposed/destroyed shall also be maintained for documents mentioned in Annexure I. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the Company Secretary or Authorised Person.

### **For Praj Industries Limited**

Sd/-

**Dr Pramod Chaudhari**  
**Chairman**

**Date: 5<sup>th</sup> November, 2025**

**ANNEXURE A**  
**REGISTER OF DISPOSAL OF RECORD/DOCUMENTS**  
(for documents mentioned in Annexure I)

Particulars of document along with statutory provision	Date and mode of destruction	Name & Signature of Authorised Person