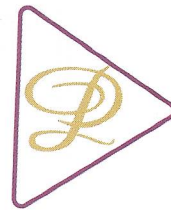


PATEL RETAIL LIMITED

(FORMERLY KNOWN AS PATEL RETAIL PRIVATE LIMITED)

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PATEL RETAIL LIMITED

TRUST & TOGETHERNESS

POLICY FOR PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. PREFACE AND OBJECTIVE

The Board of Directors (“**Board**”) of Patel Retail Limited (“**Company**”) have adopted the following Policy for ‘*preservation of documents*’ (“**Policy**”) in terms of regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time and other applicable provisions (“**SEBI Listing Regulations**”).

As per regulation 9 of the SEBI Listing Regulations, the listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two (2) categories i.e., (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight (8) years after completion of the relevant transactions. The listed entity may keep such documents specified in clauses (a) and (b) in electronic mode.

The Policy has been approved by the Board in its meeting held on Saturday 30th December 2023.

2. EFFECTIVE DATE

The Policy shall be effective from the date the SEBI Listing Regulations take effect with respect to the Company.

3. DOCUMENTS TO BE PRESERVED

This Policy sets the standards for preservation of documents of the Company, broadly classified in the following categories, which may be preserved, in physical and/or electronic mode.

(I) *Category A- Documents whose Preservation shall be permanent in nature*

The following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- (i) Incorporation documents;
- (ii) Statutory registers required under applicable laws;
- (iii) Policies, Charters and Codes of the Company;
- (iv) Minutes of the Board meetings and Board Committees as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India;

- (v) Minutes of General meetings as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India;
- (vi) Register of directors and Key Managerial Personnel;
- (vii) Register of Renewed and Duplicate Share Certificates in Form SH-2;
- (viii) Share certificate forms and related books and documents (disputed cases);
- (ix) Register of Charges- Form CHG-7;
- (x) Register of Members along with the index (Form MGT-1);
- (xi) Register under section 186 (Form MBP-2) of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities);
- (xii) Register under section 187 (Form MBP-3) of the Companies Act, 2013 (investment held in the name of any other person);
- (xiii) Register in Form MBP-4 under section 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 and 188 of the Act);
- (xiv) Property card, ownership records issued by government Authority;
- (xv) Trademarks, copyrights, patents;
- (xvi) The Original signed and stamped Memorandum of Association and the Articles of Association of the Company;
- (xvii) Material agreements/ contracts, which, even if terminated, may have an impact on business;
- (xviii) Any other document, certificates, statutory registers that may be required to be preserved permanently in terms of the Companies Act, 2013 and/ or SEBI Regulations.
- (xix) Prospectus / offer documents issued by the Company.

(II) *Category B- Documents with preservation period of not less than eight (8) years after completion of the relevant transactions*

The following documents shall be maintained and preserved for a period not less than eight (8) years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight (8) years.

- (i) Documents/information furnished to Stock Exchanges including information submitted in compliance of SEBI Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight (8) years from the end of the financial year in which the documents/information is furnished.
- (ii) Disclosures made under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (iii) Books of accounts;
- (iv) Annual Returns (including copies of all certificates and documents required to be annexed thereto) as per the Companies Act, 2013;
- (v) Office copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- (vi) Disclosure of interest received from directors of the Company in the manner prescribed.

- (vii) Instrument creating a charge or modifying a charge;
- (viii) Employment record for the employees of the Company;
- (ix) Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings shall be preserved for as long as they remain current or for eight (8) financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India;
- (x) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight (8) financial years and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India;
- (xi) The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means;
- (xii) Documents as are required to be maintained under relevant laws relating to direct and indirect taxes;
- (xiii) Marketing documents;
- (xiv) Press releases;
- (xv) Legal documents which include, but shall not be limited to, legal memoranda and opinions, pleadings, litigation files, documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter shall be retained till Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded. In court cases, the connected documents / files should be retained till disposal of the case by the highest Court of appeal and the legal department should be consulted to determine the retention period of the documents;
- (xvi) Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act, 2013 and/or SEBI Regulations.

(III) Category C- Documents with preservation period specified by statutory authorities under applicable laws

In addition to the documents mentioned in Categories A and B above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing rules/ procedures/ practices of the Company or as per the applicable statutory/ regulatory provisions in this regard.

4. RESPONSIBILITY

The heads of respective departments of the Company shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.

5. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode, under the instructions approved by the Board / concerned Functional Director/ Head of the Department. This applies to both physical and electronic

documents. The Company shall maintain a register containing the particulars of documents destroyed, date and mode of destruction with the initials of the Director / concerned Functional Director / Head of Department or such other persons as may be authorised for the purpose.

6. DISSEMINATION OF THE POLICY

The Policy, amended from time to time, shall be placed on the website of the Company.

7. POLICY REVIEW

The Board may subject to applicable laws is entitled to amend, suspend or rescind this Policy at any time. Any difficulties or ambiguities in the Policy will be resolved by the Board in line with the broad intent of the Policy. In the event of any conflict between the provisions of this Policy and the SEBI Listing Regulations, the SEBI Listing Regulations shall prevail over this Policy.