

BEML LAND ASSETS LIMITED

Policy on Preservation of Documents & Archival Policy

[As duly approved by the Board of Directors in its 12th Meeting held on 12.12.2022 pursuant to Regulation 9 and 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. Preamble

1.1 Documents and archives form an essential and significant part of the historical data bank of every organisation. Documents/ records are a basic tool of administration. They are the means by which operational processes and functions are planned and performed.

1.2 Securities and Exchange Board of India [SEBI], has vide its notification dated 2nd September 2015, introduced the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 [*hereinafter referred to as Listing Regulations*], with effect from 1st December 2015. Regulation 9 of Chapter III of the Listing Regulations requires the Company to frame a policy on preservation of documents. Further, Regulation 30 (8) requires the Company to frame a Policy on website disclosure and archival of such disclosure.

1.3 In compliance to the aforesaid Regulations, this policy is framed for the purpose of systematic, categorization, maintenance, retention of documents received or created in the course of business. The Policy further encompasses the manner of archival of the documents which have been disclosed on the website of the Company from time to time.

2. Scope

This policy is formulated to establish the framework needed for effective preservation/ maintenance of documents and records required to be maintained by the Company.

3. Objectives

The objective of this Policy is:

- To provide a framework for the purpose of systematic categorization, maintenance and preservation of documents in the Company.
- To provide a framework of archival of events/ information required to be disclosed on website under SEBI Listing Regulations and other information hosted on the website of the Company.

4. Definitions

4.1 “Applicable Law” means any law, rules and regulations, or standards applicable on the Company under which any guideline/ provision with regard to the preservation of the documents has been prescribed.

4.2 “Board” means the Board of Directors of the Company.

4.3 “Company” means BEML Land Assets Limited.

4.4 “Current Document(s)” means any Document that still has an ongoing relevance with reference to any ongoing contract, litigation, proceedings, complaint, dispute, or any like matter.

- 4.5 “Document(s)” refers to notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, registers and or any other record (including required under or in order to comply with the requirements of any Applicable Law) maintained on paper or in Electronic Form and does not include multiple or identical copies.
- 4.6 “Electronic Form” means maintenance of documents in any contemporaneous 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.
- 4.7 “Maintenance” means keeping Documents, either physically or in Electronic Form.
- 4.8 “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.
- 4.9 “Head of Function/ Department” means Head of Function/ Department like Marketing/ Commercial, Production, Planning, Materials, Stores, Finance, Human Resources, etc. as duly appointed/ nominated by the management of the Company from time to time.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

5. Policy on Preservation of Documents

5.1 Classification based on preservation period

Based on preservation duration, the company shall classify the documents in following categories.

(a) Documents on Company’s Policies:

The preservation period for any policy related document shall commence on the date of introduction of initial version or, as the case may be, the revised version.

(b) Documents whose preservation shall be permanent in nature:

Certificate of Incorporation, Memorandum & Articles of Association, Minutes of Board/ General Meetings, Statutory Returns of the Company under direct taxes, Statutory Registers to be maintained permanently under Companies Act, 2013, Trade secrets, definitive documents for acquisition/ merger of with a company, etc. shall be preserved permanently.

(c) Documents with preservation period of not less than eight years after completion of the relevant transactions:

Books of Account as defined in Companies Act 2013, Statutory Registers/ Documents required to be maintained for 8 (eight years) under Companies Act, 2013, Technology Collaboration Agreements, Joint Venture Agreements, Press releases and other Statutory Returns required as per concerned Act shall be preserved for a period of not less than eight years after the completion of the relevant transactions

(d) Documents with preservation period of less than eight years after completion of the relevant transactions:

Customer orders, Records related to Court/ Arbitration/ Judicial/ Quasi-Judicial cases, etc- shall be preserved for a period of less than 8 years subject to the condition that transaction/ agreement/ cases are not current and have been completed/ expired/ disposed of.

All such events or information which has been disclosed to Stock Exchanges and hosted on Company's website for the purpose of shareholder communication shall be maintained for 5 Years. Thereafter all such hosting shall remain archived for a period of subsequent 3 (three) years by adopting appropriate technology.

Any other document not covered under (a), (b), (c) and (d) above shall be preserved by the concerned Head of Function/ Department during the preservation period as decided by him/ her in line with the operational requirement subject to the requirements, if any, under any of the law.

Notwithstanding provisions herein above the documents shall also be preserved to meet the requirement under the regulations in the following manner:

- a) Where there is a period for which a Document is required to be preserved as per applicable law, for the period as specified under such law.
- b) Where there is no such requirement under any applicable law, then for such period till the document remains "Current".
- c) In case of any other Document, for such period, as the respective Head of Function/ Department shall decide after taking a considered view about its relevance.

5.2 Modes of preservation

The Documents may be preserved in

- Physical Form and/or
- Electronic form.

5.3 Responsibility for preservation of Documents

The responsibility for preservation of documents shall be with the Head of Function/ Department concerned.

5.4 Destruction of Documents

After retention period, Head of Function/ Department concerned shall decide the records which shall be destroyed. A list of the Documents so destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of destruction, and mode of destruction.

5.5 Conversion of the form in which the Documents are preserved

The physical Documents that are preserved may also be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

6. Archival Policy

This policy shall apply to all the investors' information hosted on the website of the Company including events/information required to be disclosed on Company's website under SEBI Listing Regulations.

The disclosure of material/ events shall be hosted and retained on the Company's website for a minimum period of 5 (five) years. Thereafter all such hosting shall remain archived for a period of subsequent 3 (three) years by adopting appropriate technology.

7. Interpretation/ Clarification

Any interpretation/ clarification related to the above policies shall be issued by the Head of Corporate HR in consultation with Head of Function/ Department concerned.

8. Implementation of the Policy

In case of conflict between this policy and any other procedures/ instructions/ guidelines etc., on preservation and archival of documents, the provisions of these policies shall take precedence.

In specific cases of conflict being encountered with respect to preservation/ archival of a document created before the date of issuance of these policies, the respective Head of Function/ Department shall be the approving authority to interpret such cases in the light of the subject policies as issued initially or, as the case may be, amended from time to time. Head of Function/ Department shall ensure that the provisions under these policies is not violated/ contradicted.

9. Authority to make alterations to the Policy

The Chairman is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the SEBI Listing Regulations and other applicable laws.

10. Effective Date of these Policies

These policies have become effective from the date of approval by the Board of Directors.