

THAKKERS DEVELOPERS LIMITED

Regd Office: 37/39, Kantol Niwas,

3rd Floor, Modi Street, Fort,

Mumbai, Maharashtra – 400 001

E-mail id: thackersdevelopersltd123@gmail.com

Contact: 022-32450425

CIN: L45200MH1987PLC043034

POLICY FOR PRESERVATION OF DOCUMENTS

INTRODUCTION

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) requires the Board of Directors of every Company who have its securities Listed on any stock exchange to frame a policy for providing framework for adequate protection and preservation of the documents of the Company as per the applicable statutory requirements. Accordingly, **Thackers Developers Ltd (TDL)**, being Equity listed company, the provisions of Listing Regulations are applicable to it and this policy is framed to comply with the said requirement.

The Board of Directors of **Thackers Developers Ltd** has adopted this Policy.

The Board may amend this Policy from time to time as they may deem fit and/or to incorporate any subsequent amendment(s)/modification(s) in the Listing Regulations with respect to matters covered under this Policy or otherwise.

1. DEFINITIONS

“**Act**” means the Companies Act, 2013 & rules made thereunder.

“**Applicable Law**” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

“**Board of Directors**” or “**Board**” means the Board of Directors of BLS International Services Ltd., as constituted/re-constituted from time to time.

“**Company**” means BLS International Services Ltd.

“**Listing Regulations**” means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Policy**” or “**this Policy**” means Policy for Preservation of Documents.

“**Stock Exchanges**” means the stock exchanges where the Company’s securities are listed.

“**SEBI**” means Securities & Exchange Board of India.

The words, terms and expressions used in this Policy shall have the same meaning as given in Clause 2 of Chapter I of the Listing Regulations.

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II. PRESERVATION OF DOCUMENTS

- Documents as per Annexure A and those which are required to be maintained under various Acts/Rules/Regulations applicable to the Company shall be maintained and preserved as per the provisions content therein.
- The Documents Preservation Schedule is annexed herewith as “Annexure A” for the guidance of the concerned departments of the Company.
- It shall be the responsibility of the concerned head of department to keep the annexed Documents Preservation Schedule updated from time to time to ensure that it is in compliance with the various Acts/Rules/Regulations applicable to their respective Departments and for this purpose, they shall communicate any changes desired in the abovementioned Schedule to the Company Secretary.
- In case of any inconsistency in the annexed Documents Preservation Schedule and the provisions of various Acts/Rules/Regulations applicable to the Company, such provisions shall prevail.
- The documents mentioned above can be maintained by the Company in physical or electronic or digital mode, if permitted under the applicable Acts/Rules/Regulations.
- The concerned head of department shall keep in his custody the documents which are of important and/or confidential nature and list of the same shall be maintained in a Register to be kept in his/her custody and he/she shall be responsible for the preservation of the same. The said documents along with the Register shall be handed over by him/her to the successor in the event of such head of department leaving the Company/Department.

III. DESTRUCTION OF DOCUMENTS

- After the expiry of the preservation period specified in the annexed Documents Preservation Schedule, such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval of Directors of the Company. The records of the documents destroyed shall be maintained by the department concerned and shall be produced whenever required by the concerned authority/auditors.
- In case any specific procedure is prescribed under applicable Act/Rule/Regulation for destruction of the documents, the same shall be followed by the Company.
- Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the

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destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed off finally.

IV. ARCHIVAL OF DOCUMENTS

Documents mentioned in the annexed Documents Preservation Schedule which are not required regularly can be archived by the department concerned in the following manner:

- Documents to be archived should be kept in the storage locations earmarked by the Company for the purpose in secured place or cupboard having access only by the authorized personnel.
- If considered appropriate, services of external archival agencies may be utilized;
- Documents should be boxed and the box should be labelled with the reference number and list of the files/documents. List of documents contained in the box should be kept inside the Box and shall also be kept by the concerned department;
- Documents should be stored in a way that preserves their integrity and readability and restricts access to authorized personnel only;
- The medium used to store documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available to the Auditors or Regulatory Authorities upon request;
- The department head concerned should maintain a record of documents archived, box reference number and storage location; and
- Electronic records i.e., e-mails, files etc. should be archived as per IT Policy of the Company.

V. DISCLOSURES

The Company shall disclose this Policy on its website.

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ANNEXURE A

DOCUMENTS PRESERVATION SCHEDULE

Sr. No.	Type of Document	Preservation Period	Concerned Department
1	Common Seal	Permanent	Secretarial
2	Certificate of Incorporation, Certificate of Change in Name etc.	Permanent	Secretarial
3	Statutory Registers & Minutes	Permanent	Secretarial
4	Register of Members	Permanent	Secretarial
5	Index of Members	Permanent	Secretarial
6	MCA Forms	Permanent	Secretarial
7	Scrutinizers Reports	Permanent	Secretarial
8	Annual Audit Reports and Financial Statements	Permanent	Secretarial
9	Annual Returns	8 Years	Secretarial
10	Attendance Register	8 Years	Secretarial
11	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8 Years	Secretarial
12	Office copies of Notice of General Meeting and related papers	8 Years	Secretarial
13	Board Agenda and supporting documents	8 Years	Secretarial
14	Insurance Policies	4 Years	Finance & Account
15	Tax Exemption and Related documents	Permanent	Finance & Account
16	Bank Statement	4 Years	Finance & Account
17	Investment Records	8 Years	Finance & Account
18	Journal Entry support data	8 Years	Finance & Account
19	Books of Accounts, Ledgers and Vouchers	8 Years from the end of Financial Year or completion of assessment under Income Tax whichever is later	Finance & Account

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20	Tax Deducted at Source Records	8 Years from the end of Financial Year or completion of assessment under Income Tax whichever is later	Finance & Account
21	Income Tax papers	8 Years from the end of Financial Year or completion of assessment under Income Tax whichever is later	Finance & Account
22	Service Tax papers	8 Years from the end of Financial Year or completion of assessment under Income Tax whichever is later	Finance & Account
23	Court Orders	Permanent	Legal
24	Original Property Purchase and Sale Agreement	Permanent	Legal
25	Legal Memoranda and opinion including subject matter files	3 Years after the close of matter	Legal
26	Litigation files	3 Years after the close of matter	Legal