

Policy for Preservation of Documents

Bellona Estate Developers Limited

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Policy for Preservation of Documents

1. Preamble

The Securities & Exchange Board of India (SEBI) has notified "SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Regulations") on September 2, 2015.

The Regulation requires the Board of Directors of the Company to frame a policy for Preservation of Documents classifying them into two categories.

- (i) Documents whose preservation shall be permanent;
- (ii) Documents to be preserved for not less than eight years.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that documents whether in physical or on electronic mode, forms an important and integral part of Company's records. The preservation of Documents is important in order to ensure minimum access to the records, its retrieval and authentication.

Accordingly the Board of Directors of Bellona Estate Developers Ltd. ("the Company") has adopted this policy for preservation of documents.

2. Applicability: This policy is applicable to all the Documents maintained in physical and electronic mode by the Company.

The Documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

3. Documents:

For the purpose of this Policy, the term "Documents" shall mean statutory records, registers, returns, forms etc. required to be maintained and preserved by the Company in physical or electronic form under the Companies Act, 1956/ Companies Act, 2013 and Depositories Act, 1966.

4. Documents to be preserved permanently:

(A) Companies Act, 2013

- Memorandum & Articles of Association as amended from time to time.
- Register of Contracts
- Register of Directors and KMPs and the securities held by them.
- Register of Loans and Investments made by the Company.
- Register and Index of Members

- Minutes of the Board, Committees of the Board and General Body Meetings including the meeting conducted through Postal Ballots.
- Resolutions passed by Circulation
- Various Forms and returns filed with the Authorities
- Audited Financial Statements.

(B) SEBI (Listing Obligation and Disclosure Requirements), 2015:

- Listing Agreement executed with the Exchanges.
- Offer documents for Private placement of securities filed with Securities and Exchange Board of India.

(C) Depository Act:

- Confirmation of all Corporate Actions in respect of allotment of securities.
- Intimation of allotment of ISIN for securities issued.

(D) Others:

- Registers of Records and Documents destroyed.

5. Following documents shall be preserved and maintained for a period of 8 years from the date of its event, unless specified under any other Act or rules, for a longer duration.

(A) Companies Act 1956/Companies Act, 2013.

- Register of Buyback of Securities from the date of completion of buyback.
- Notices and Notes to agenda to the Board, Committees of Board, General Meetings and Postal Ballots.
- Register of Charge from the date of satisfaction of respective charge.
- Register of Debentures and Debenture Trustees Deed from the date of redemption.
- Books of Accounts including vouchers and bills.
- Annual Returns together with Annexures.
- Register of Transfer and Transmission of shares/debentures and other securities
- Scrutinizer's Report on Postal Ballot and AGM
- Documents relating to appointment of Managerial Personnel.
- Dividend reconciliation statement till the time the dividend is transferred to IEPF.

(B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

- All reports filed with stock exchanges from time to time
- All disclosure of various events and Press Release.
- Intimations of Board Meetings.

6. Review of Policy

This Policy shall be subject to review, if necessary. Any change/amendments in applicable statutes with regard to maintenance and preservations of documents and records shall be deemed to be covered in this policy without any review. Any change/amendments of this policy shall be approved by the Chairman and/or the Company Secretary.

7. Effective date

The effective date of this policy is February 12, 2016.