

URJA GLOBAL LIMITED CHAPTER I: POLICY ON PRESERVATION OF DOCUMENTS

1. Introduction

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

Regulation 9 of the aforesaid Regulations requires the Board of Directors of the Company to frame a Policy for Preservation of Documents ("Policy") classifying them into two categories:

- i. Documents whose preservation shall be permanent in nature; and
- 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 recognises that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

2. Definitions

- (i) "Board of Directors" or "Board" shall mean the Board of Directors of the Company, as constituted from time to time.
- (ii) "Company" shall mean Urja Global Limited.
- (iii) "Documents" shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- (iv) "Listing Regulations" shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

a) The documents of a permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time:

provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- b) The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure 2) shall be preserved by the Company for the term not less than eight years after completion of the relevant 2 transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time:
 - (i) provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years, and;
 - (ii) provided further that the Company shall keep the documents as specified above in an electronic mode.

3. Authority to make alteration to the policy

Any director of the Company or the Company Secretary is authorized to make such alteration to this policy as considered appropriate, however, subject to the condition that such alteration shall be in accordance with applicable laws, including the provisions of the Companies Act, 2013, as amended (the "Companies Act") and the Listing Regulations.

4. Destruction of records

The records/ documents preserved shall be reviewed every year or according to the need of the respective departments and actions taken to destroy those records which are due for disposal.

5. Authenticity

Where a document is being maintained both in physical form and Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

6. Mode of preservation

Records/documents may be preserved either physically or in electronic form.

7. Policy Review

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this Policy shall be approved by the Board of Directors.

ANNEXURE 1

a) Documents Whose Preservation Shall Be Permanent In Nature

- 1. Registration Certificate
- 2. Memorandum and Articles of the Company
- 3. Affidavit from the subscribers to the memorandum and from person named as the first directors
- 4. Statutory Registers required under applicable laws
- 5. Audited financial statements
- 6. Minutes of Board/General/Committee Meetings
- 7. Material Agreement/Contract
- 8. Order issued by Courts/Statutory Bodies
- 9. Any other documents as may be require to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

ANNEXURE 2

b) Documents with preservation period of not less than eight years after completion of relevant transaction

- 1. Books of Accounts
- 2. Annual Return(s)
- 3. Personnel Documents
- 4. Insurance Policies/Claims under various
- 5. All notices pertaining to disclosure of interest of directors
- 6. Correspondence with Department/Shareholders
- 7. Non-Statutory Registers/Documents
- 8. Certificates surrendered to a Company
- 9. Instrument creating a charge or modification
- 10. Films, Video, CDs, DVDs, etc
- 11. Any other documents as may be require to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

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CHAPTER II: ARCHIVAL POLICY

1. Introduction

Regulation 30(8) of the Listing Regulations requires every listed entity to make available an archival policy on its website. In this context, the following policy has been framed by the Company.

2. Objectives

Pursuant to Regulation 30(8) of the Listing Regulations, records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual, legal or regulatory requirements or for other purposes as may be set forth below. Records that are no longer required, or have satisfied their required periods of retention, shall be destroyed as per the procedure prescribed under law.

3. Scope

In line with the Company's Policy on Determination of Materiality of Events and as per the Listing Regulations, the Company shall disclose all such events to the Stock Exchanges and such disclosures shall be hosted on the website of the Company for a period of 5 years and thereafter the same shall be archived so as to be available for retrieval for a further period of three years by storing the same on suitable media. Thereafter the said information, documents, records may be destroyed as per the policy on preservation of documents.

4. Policy Review

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for noting at a meeting of the Board