



POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

The Board of Directors of Valor Estate Limited (formerly known as D B Realty Limited) ("the Company") is required to formulate a policy for "Preservation of Documents" to comply with the requirements of Regulation 9 of the Listing Regulations.

2. SCOPE

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVE OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

- Identification of Statutory registers and other records of the Company which are required to be preserved.
- Identification and categorization of the statutory registers and other records to be maintained either for a period of eight years or permanently.
- decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- decide the procedure to destroy the documents after eight years or other applicable period.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

4. DEFINITIONS

"Board of Directors" or "Board" shall mean the Board of Directors of D B Realty Limited, as constituted from time to time.

"Company" Company shall mean **"Valor Estate Limited"**.

"Current" means running matter or whatever is at present in course of passage.

“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.

“Electronic Form” means 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 or otherwise the Company has control over access to it

“Listing Regulations” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”)

“Maintenance” means keeping documents , either physically or in Electronic form.

“Policy” means “Policy on Reservation of documents”

“Preservation” means to keep the documents preventing them from being altered, damaged or destroyed.

“Register” means a register maintained under the Companies Act, 2013 or the SEBI Act.

5. INTERPRETATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. GUIDELINES

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

- a. Documents whose preservation shall be permanent in nature;
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that need to be preserved and retained permanently
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.
- e. An indicative list of the documents and the time-frame of their preservation is provided in **Annexure – 1 and Annexure 2-**.



7. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company including full time consultants and / or part time consultants employed/retained by the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

8. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

9. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

10. POLICY REVIEW:

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements.

11. AMENDMENT

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations

12. COMMUNICATION AND DISSEMINATION OF THE POLICY

Copy of this policy circulated among all the Directors of the Company and also the departmental heads for circulation to the employees. The new employees shall be informed about the policy. This policy as amended from time to time shall be made available at the Web site of the Company.

Annexure 1

Documents whose preservation shall be permanent in nature

S.No	Nature of Document (s)
1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited financial statements
5.	Minutes of General Meeting
6.	Minutes of Board Meeting
7.	Minutes of various Committee Meetings
8.	Material Agreements/Contracts
9.	Orders issued by Courts/Statutory bodies
10.	Investment Documents/proofs including certificates etc.
11.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

Annexure 2

Documents with preservation period of not less than eight (8) years after completion of the relevant transactions

S.No	Nature of Document (s)
1.	Books of Accounts
2.	Annual Return(s)
3.	Personnel Documents
4.	Insurance Policies/ Claims under various policies
5.	Correspondences with Departments/shareholders



6.	Non-Statutory Registers/Documents
7.	All important Emails received from Internal and External Sources related to business issues
8.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.