

POLICY FOR PRESERVATION OF DOCUMENTS

1. PREAMBLE

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires the Board of Directors of the Company to frame a Policy for Preservation of Documents (“Policy”) classifying them into 2 (two) categories:

- a. Documents whose preservation shall be permanent in nature; and
- b. Documents with preservation period of not less than 8 (eight) years of completion of the relevant transactions

The Company may keep documents specified in clauses a. and b. above in physical/ electronic mode. The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. VRUNDAVAN PLANTATION LIMITED (“VRUNDAVAN” or “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.

Accordingly, the Board of Directors of the Company of has adopted the Policy for Preservation of Documents.

2. APPLICABILITY AND MODE OF PRESERVATION

- a. This Policy is applicable to all Documents (defined hereinafter) maintained in physical and electronic mode by the Company. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the Documents.
- b. The Documents not specifically 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. This Policy shall come into force from the date of approval by the Board of Directors.

3. DEFINITIONS

- a. “Applicable Law” means all applicable statutes, enactments, laws, ordinances, bye-laws, rules, regulations, guidelines and notifications having force of law, notices, and/or judgments, decrees, injunctions, writs or orders of any court, statutory or regulatory authority, tribunal, board or stock exchange in any jurisdiction as may be in force and effect during the subsistence of this Policy under which the preservation of documents has been prescribed.
- b. “Board” means the Board of the Directors of the Company.
- c. “Company” means Vrundavan Plantation Limited (“VRUNDAVAN” or “the Company”).
- d. “Documents” refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.

VRUNDAVAN PLANTATION LIMITED
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e. "Electronic Form" means information generated, received, sent or stored in media, magnetic, optical, computer memory, computer memory, micro film, computer generated micro fiche or similar device.

f. "Maintenance" means keeping documents, either physically or in Electronic Form.

g. "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed. Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

4. ROLES AND RESPONSIBILITIES

The respective regional heads and other functional/ departmental heads of the Company shall be responsible for Maintenance and Preservation of Documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

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. PRESERVATION OF DOCUMENTS

(a) Documents that need to be preserved/retained permanently have been set out at Annexure 1 to this policy.

(b) Documents that may be preserved/retained for a period of 8 (eight) years or more after the end of the financial year have been set out at Annexure 2 to this policy. The Chief Financial Officer, Chief Compliance Officer and Head – Legal and Company Secretary and Compliance Officer are severally authorized to update the said Annexure as deemed appropriate.

(c) The documents concerning other routine matters and having substantial long-lasting consequences shall be preserved by all the concerned persons /Regional Heads / Finance Head/ CFO and/or the departmental heads of the Company depending upon usefulness and necessity.

(d) Where, the Documents of the Company are maintained by any external agency like the Registrar and Share Transfer agents, the Company will endeavour to ensure that such agency preserves the Documents of the Company for atleast such time as is specified herein.

7. DISPOSAL OF DOCUMENTS

After the retention period, the preserved documents may be disposed / destroyed after seeking the approval of the Board.

8. DISSEMINATION OF THE POLICY

The approved Policy shall be uploaded on the Company's website.

9. REVIEW AND AMENDMENT

a. Notwithstanding anything contained in this policy, the Company shall ensure compliance with additional requirements as may be prescribed under applicable laws either existing or arising out

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of any amendment to such applicable laws or otherwise and applicable to the Company from time to time.

b. This Policy is intended to be in conformity with the LODR as on the date of its adoption. However, if due to subsequent modifications in the LODR or any other applicable law, a provision of this Policy or any part thereof becomes inconsistent with the LODR, the Act or any other applicable law, then the provisions of such laws, as modified, shall prevail.

10. EFFECTIVE DATE

This policy shall be effective from June 05, 2023.

11. CONTACT

For queries related to this Policy, please contact

Compliance Officer-Vrundavan Plantation Limited

Email id: cs@vrundavanplantation.com

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ANNEUXRE 1

Documents that need to be preserved/retained permanently

1. Memorandum and Articles of Association of the Company
2. Certificate of Incorporation of the Company (including fresh certificates as may be issued)
3. Minutes of Board Meetings, Committee Meetings and General Meetings including Postal Ballot
4. Register of Members
5. Register of Loans, Guarantee, Security and in respect of Acquisition made by the Company
6. Register of Investment not held in its own name by the Company
7. Register of Contracts or arrangements with related party and with bodies corporate etc., in which Directors are interested
8. Register of Charges
9. Register of Renewed and Duplicate Share Certificates
10. Register of Directors and KMP
11. Any other document as may be required to be preserved / retained permanently under applicable laws from time to time

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ANNEXURE 2

Documents that may be preserved/retained for a period of 8 (eight) years or more after the end of the financial year

1. Books of accounts including vouchers relevant to any entry in such books
2. Disclosure of interests by Directors
3. Register of Deposits
4. Instrument creating or modifying a Charge
5. Foreign Register of Debenture holders/ other security holders with index of names
6. Foreign Register of Debenture holders/ other security holders with index of names
7. Annual Return and copies of all certificates and documents required to be annexed thereto
8. Attendance Registers, Notices, Agenda, Notes on Agenda and other related documents of Board and Committee Meetings
9. Notices, Scrutinizer's Report and other related documents of General Meetings including Postal Ballot
10. Any other document as may be required to be preserved / retained for a period of 8 (eight) years or more after the end of the financial year under applicable laws from time to time

SIGNATORIES

Version	Prepared by	Reviewed by	Confirmed by	Approved by
1.0	Company Secretary cum Compliance Officer	Chief Financial Officer		Board of Directors