

PRESERVATION OF DOCUMENTS POLICY

1. LEGAL FRAMEWORK

The Board of Directors of Srajan Capital Limited (“Company”) is required to formulate a policy for “Preservation of Documents” (“Policy”).

2. DEFINITIONS

“**Board of Directors**” or “**Board**” shall mean the Board of Directors of the Company, as constituted from time to time.

“**Company**” shall mean Srajan Capital Limited.

“**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.

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

1. 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.

2. 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 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").

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. SUSPENSION OF RECORDS DISPOSAL IN THE EVENT OF LITIGATION/CLAIMS

In the event the Company is served with any notice for documents from any statutory authority or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of notice/litigation, etc. shall be suspended until such time the matter is settled or resolved or disposed off. The company secretary shall immediately inform all employees of the Company for suspension of further disposal of Documents.

6. MODE OF PRESERVATION

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

7. POLICY REVIEW

The Board of Directors may subject to applicable laws amend/substitute any provision(s) with a new provision(s) or replace this Policy entirely with a new policy. If any subsequent changes in the Companies Act are inconsistent with any part of this Policy, the provisions of the Companies Act, as the case may be, shall prevail over the Policy and the provisions in the Policy shall be modified to make it consistent with such applicable law.