

# BAJAJ HOLDINGS & INVESTMENT LIMITED

## POLICY ON PRESERVATION OF DOCUMENTS

<b>Version control</b>			
<b>Version</b>	<b>Date of Approval / Amendment</b>	<b>Remarks</b>	<b>Author</b>
1.0	21 October 2015	Adoption of the Policy	Secretarial Team
1.1	15 March 2023	Annual Review	Secretarial Team
1.2	21 March 2024	Annual Review	Secretarial Team
1.3	21 March 2025	Annual Review	Secretarial Team
1.4	16 September 2025	Amendment in the Policy	Secretarial Team
1.5	20 March 2026	Amendment in the Policy	Secretarial Team

## **Background:**

1. As per Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (herein after referred to as SEBI Listing Regulations), a listed entity is required to have a policy for Preservation of documents, approved by the Board of directors, classifying them in at least two categories viz.-
  - (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

Such documents may be kept in an electronic mode.

2. The Companies Act 2013 along with Rules framed thereunder and SEBI Listing Regulations have prescribed certain registers, returns and records to be preserved by a company.

## **Policy:**

Taking into account the aforesaid provisions & other applicable legal provisions, the Policy on preservation of documents, to the extent applicable to the company, is being made as under:

1. Documents whose preservation shall be permanent in nature shall be as per **Annexure 1 – A**.
2. Documents shall be preserved for the period as specified in the annexure 1-B and thereafter as per the discretion of the Compliance Officer .
3. The documents referred to above may be maintained in physical or electronic mode.
4. Custody of all such Registers / Records / Documents, except Register of Loans & Investments and books of accounts, shall be with the Company Secretary of the Company or such other person as may be specifically authorised by the Board for the purpose. Custody of Register of Loans & Investments and books of accounts shall be with the Chief Financial Officer of the Company or such other person as may be specifically authorised by the Board for the purpose.
5. Back-up of the records maintained in electronic mode may be taken on a periodic basis.
6. The documents after the expiry of the stipulated period for preservation, may be destroyed / extinguished with approval from the Chairman or the Managing Director and a register shall be maintained in an appropriate form, in physical or electronic mode, wherein brief particulars of the documents destroyed shall be entered.
7. The Chairman is authorised to make appropriate changes to the above policy & decide on the period for preservation for various other documents based on the law for the time being in force.
8. This Policy is subject to review from time to time.

## Annexure 1 – A

### Documents whose preservation shall be permanent in nature

- i) Register and index of Members
- ii) Foreign register of members
- iii) Minutes of meetings
- iv) Register of Loans and Investments
- v) Register of charges
- vi) Register of renewed and duplicate certificates
- vii) Register of contracts or arrangements in which directors are interested
- viii) Register of investments not held in Company's name
- ix) Such other Registers / Records, as may be prescribed from time to time, required to be maintained permanently.

## Annexure 1 – B

### Documents with specified preservation period after completion of the relevant transactions

Sr. No.	Document	Period
i.	Register and index of debenture holders	8 years
ii.	Copies of annual returns filed with the Registrar	8 years
iii.	Foreign register of debenture holders	8 years
iv.	Books of Accounts	8 years
v.	Copies of Notices, Agenda, Notes on Agenda and other related papers	8 years
vi.	Register of directors' attendance	8 years
vii.	Copy of instrument creating / modifying charge	8 years
viii.	Notice of disclosure of interest from Directors and Key Managerial	8 years
ix.	Annual Reports, Postal Ballot, Scrutiniser's Report and other related	8 years
x.	Transcript of calls pertaining to analyst or institutional investor meet*	5 years
xi.	Audio/ video recordings of analyst or institutional investor meet*	2 years
xii.	Tape recording(s) or other electronic recording mechanism used for board meetings held through video conferencing or audio-visual means.	At least upto the time of Completion of audit of that
	<b>Such other Registers / Records, as may be prescribed from time to time</b>	

\* These documents shall be hosted on the website of the Company.

Pune  
20 March 2026

Chairman