

**Shree Surgovind Tradelink Limited**

**Policy for Preservation of Documents**

# **POLICY FOR PRESERVATION OF DOCUMENTS**

## **1. Preface**

The Board of Directors (the “Board”) of SHREE SURGOVIND TRADELINK LIMITED (the “Company”) has approved the following Policy (“The Policy”) of the Company for preservation of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Policy may be amended or modified by the Board of Directors by passing the resolution to that effect.

## **2. Purpose of the Policy**

Regulation 9 of the Listing Regulations mandates that a 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 a preservation period of not less than eight years after completion of the relevant transactions.

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

## **3. Definitions**

“Act” means the Companies Act, 2013.

“Applicable Law” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

“Authorized Person” means any person duly authorized by the Board or the Managing Director / Whole Time Director.

“Board” means the Board of directors of the Company or its Committee.

“Company” means Shree Surgovind Tradelink Limited.

“Document(s)” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and 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 and does not include multiple or identical copies.

Document(s) includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

“Electronic Record(s)” means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.

“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.

“Maintenance” means keeping Documents, either physically or in Electronic Form.

“Preservation” means to keep or retain in good order and to prevent from being altered, damaged or destroyed.

“Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

#### **4. Administration**

An indicative list of Documents and their preservation schedule is provided in **Appendix A**. All the employees shall ensure that the Documents Preservation Schedule is followed.

The Compliance Officer / Company Secretary is authorized to make modifications to the Documents Preservation Schedule from time to time with the approval of the Board to ensure that it is in consonance with the Applicable Law and business purposes.

#### **5. Procedure for disposal of Documents**

The Compliance Officer of the Company, shall in consultation with the Chairman and/or Whole Time Director/ Managing Director, shall accord approval for destruction of the documents or records being in consonance to this Policy. The Documents of the Company should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use.

The Compliance Officer may direct Employees from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under **Appendix A**. The details of the Documents destroyed by the Company shall be recorded in the “Register for Disposal of Records” to be kept in the custody of Compliance Officer of the company, in the format prescribed at **Appendix B**.

## **6. Suspension of Documents disposal in the event of Litigation or Claims**

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Functional Heads of the Company for suspension of further disposal of Documents.

## **7. Amendment**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

## **8. Archival Policy**

All information and reports uploaded / hosted on the website of the Company shall be archived after every expiry of every five years from the date of its posting or hosting. The Archived documents shall be removed / deleted from the website after expiry of five years from date of its initial archive.

## APPENDIX A – DOCUMENTS PRESERVATION SCHEDULE

### Documents / Records whose preservation shall be permanent in nature:

Sr. No.	Document type
1	Certificate of incorporation
2	Common Seal
3	Memorandum and Articles of Association
4	Agreements made by the Company with Stock Exchanges, Depositories, etc.
5	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
6	Register and Index of Members, debenture-holders, if any or other security holders, if any
7	Statutory Registers as per Companies Act, 2013
8	Books and documents relating to issue of share certificates
9	Statutory Forms and Returns except routine compliances
10	Scrutinizers Reports
11	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
12	Authorization / licenses obtained from any statutory authority
13	Policies of the Company framed under various regulations
14	Register of disposal of records
15	Annual Audit Reports and Financial Statements
16	Tax Exemption and Related documents
17	Court Orders
18	Such other records as may be required under any law from time to time

**Documents / Records to be preserved for a minimum period of eight years:**

Sr. No.	Document type
1	Annual Returns
2	Board and Committee Agenda and supporting documents
3	Attendance Register
4	Office copies of Notice of General Meetings and related papers
5	Office copies of Notice of Board / Committee Meetings
6	Listing fees
7	Disclosures under the SEBI (Prohibition of Insider Trading) Regulations, 1992 and 2015
8	Disclosures received under the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
9	Quarterly, half yearly and annual compliances under the LODR and the Listing Agreement
6	Books of Accounts, Ledgers and Vouchers
7	Bank Statements and Reconciliations
8	Investment Records
9	Tax Deducted at Source Records
10	Income Tax papers

**APPENDIX – B**

Sr. No.	Particulars of documents destroyed	Date and mode of destruction	Initials of Compliance officer or other authorized person