

## **POLICY ON PRESERVATION OF DOCUMENTS**

[Pursuant to SEBI (LODR) Regulations 2015]

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## **1. PREAMBLE:**

Pursuant to the regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ( hereinafter referred to as “Listing Regulations” ) requires every Listed Company to formulate a policy on Preservation of Documents which has to be approved by the Board of Directors.

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 preservation period of not less than eight years after completion of the relevant transactions.

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

In this context, the following policy has been framed by the Board of Directors (“Board”) of Sahyadri Industries Limited (“Company”) with an objective of classifying various records and registers for the purpose of maintenance and preservation.

## **2. PRESERVATION OF DOCUMENTS:**

Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations.

### **Documents which are to be maintained permanently:**

- The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company
- Minutes of General Meetings, Board Meetings and various Committee Meetings (Sec 25(1) of Companies (M&A) Rule)
- Register of Members along with Index (Sec 15(1) of Companies (M&A) Rule)
- Foreign Register of Members, if any (Sec 15(4) of Companies (M&A) Rule)
- Register of loans, guarantee, security and acquisition made by the company (Rule 12(3) of the Companies (Meetings of board and its Powers) Rules)
- Register of investments not held in its own name by the company, if any (Rule 14(3) of the Companies (Meetings of board and its Powers) Rules)
- Register of contracts with related party and contracts and Bodies etc. in which directors are interested
- (Rule 16(3) of the Companies (Meetings of board and its Powers) Rules)

- Register of Charges  
(Rule 10(4) of the Companies (R. O. C.) Rules)
- Registers of Renewed and duplicate share certificates  
(Rule 6 (3) of Companies (S. C. A. D.) Rules)
- Register of directors and KMP  
Section 170 of the Companies Act, 2013

Such other registers/records as are required to be maintained under this Act.

**Documents which are to be maintained for at least eight financial years:**

- Books of account together with the vouchers relevant to any entry in such books of account  
Section 128 of the Companies Act, 2013 and Rules 3 and 4 of the Companies (Accounts) Rules, 2014
- Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company if any  
Rule 4 of the Companies (Management and Administration) Rules, 2014
- Copies of all Annual Returns  
Rule 15 (3) of the Companies (Management and Administration) Rules, 2014
- Disclosure of Interest received from the Directors of the Company in the manner prescribed  
Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014 & Schedule IV
- Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings  
4.1.7 of Secretarial standards - 1 & 8.2 of Secretarial Standards- 1
- Instrument creating a Charge or modifying a Charge, if any  
Rule 10(4) of the Companies (R.O.C.) Rules, 2014
- Register of transfer of shares  
Section 56 of the Companies Act, 2013 and Rule 11 of the Companies (Share Capital and Debentures) Rules, 2014
- Register of deposits accepted or renewed, if any  
Rule 14 of the Companies (Acceptance of Deposits) Rules, 2014

Such other registers/records as are required to be maintained under this Act.

The documents maintained for eight financial years may be destroyed after the expiration of eight financial years. Documents pertaining to legal cases, litigations, tax disputes and pending assessments etc. shall be preserved beyond the period of 8 years for as long as may be required.

### **3. OTHER REQUIREMENTS:**

- Forms and Formats:

All the records shall be maintained as per the prescribed formats as amended from time-to-time under the various rules and regulations.

- Mode of Maintenance:

It may be noted that Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

### **4. DISPOSAL AND DESTRUCTION OF RECORDS:**

- The Company shall adhere to the requirements prescribed by any law and follow the procedure laid down by the Internal Audit Department of the company if any physical documents are to be destroyed. The records maintained under this Policy can be destroyed in one of the following ways:
  - a. Recycle non-confidential paper records;
  - b. Shred or otherwise render unreadable confidential paper records; or
  - c. Delete or destroy electronically stored data.

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