

POLICY ON PRESERVATION OF DOCUMENTS

**[Pursuant to Regulation 9 of the Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015]**

1. INTRODUCTION

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations” or “Regulations”] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

2. SCOPE

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVES OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The major objectives of the policy are:

- Identification of statutory registers and other records of the Company which are required to be preserved.
- Identification and categorisation of the statutory registers and other records to be maintained either for eight years or permanently.
- Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- After completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

4. DEFINITIONS

1. **“Act”** means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;

2. **“Regulations”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;
3. **“Company”, “This Company”, “The Company”, “Company”** wherever occur in the policy shall mean **“Sumeet Industries Limited”**.
4. **“Current”** means running matter or whatever is at present in course of passage.
5. **“Board of Director” or “Board”**, means the collective body of the Directors of the company;
6. **“Policy” or “This Policy”** means, “Policy on Preservation of Documents.”
7. **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
8. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
9. **“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.

5. INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. GUIDELINES

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the 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.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. documents that needs to be preserved and retained permanently;
- b. documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulations;

- c. documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.
- d. where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I

7. MODES OF PRESERVATION

The Documents may be preserved in a) Physical form or b) Electronic Form.

The official of the Company required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

8. PRESERVATION PERIOD

Based on the various provisions contained under the Companies Act, Listing Regulations and other applicable laws/rules/regulations of the Statutory Authorities, the company has classified various documents in the following two broad categories.

- 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.

8.1 Documents to be preserved permanently includes :

S. No.	Particulars	Provisions in law , if any	Responsibility
1.	Register of loans, guarantee, security and acquisition made by the Company	Section 186 of the Companies Act, 2013	Secretarial Deptt.
2.	Register of investments not held in the name of the company	Section 187 of the Companies Act, 2013	Secretarial Deptt.
3.	Register (s) of contracts or arrangements in which Directors are interested	Section 189 of the Companies Act, 2013	Secretarial Deptt.
4.	Register of Charges	Section 85 of the Companies Act, 2013	Secretarial Deptt.

5.	Register of members including an index of the names	Section 88 of the Companies Act, 2013	Secretarial Deptt.
6.	Register of Renewed and Duplicate Share Certificates	Section 46 of the Companies Act, 2013	Secretarial Deptt.
7.	Minutes of the General Meeting and resolutions passed by postal ballot	Section 118 of the Companies Act, 2013	Secretarial Deptt.
8.	Minutes of the meetings of the Board and committee thereof	Section 118 of the Companies Act, 2013	Secretarial Deptt.

8.2 Documents to be preserved for not less than 8 years after completion of the relevant transactions includes :

S. No.	Particulars	Provisions in law , if any	Responsibility
1.	Books of Account and other related papers as per Companies Act , 2013	Section 128 of the Companies Act, 2013	Finance and Accounts Deptt.
2.	Disclosure / notices of interest of directors	Section 184 of the Companies Act, 2013	Secretarial Deptt.
3.	Documents relating to Public Deposits including Register of Deposits	Section 73 of the Companies Act, 2013	Secretarial Deptt.
4.	Instrument of creation / modification / satisfaction of charges from the date of satisfaction of charge	Section 85 of the Companies Act, 2013	Secretarial Deptt.
5.	Register of Debenture Holders / Register of any other Security Holders and their respective Index of the names . from the date of full redemption of such debentures/other securities	Section 88 of the Companies Act, 2013	Secretarial Deptt.
6.	Annual return and copies of all certificates and documents requires to be annexed there to	Section 92 of the Companies Act, 2013	Secretarial Deptt.
7.	Attendance Register(s) of the meetings of the Board and Committees thereof	Secretarial Standard on Meetings of the Board of Directors	Secretarial Deptt.
8.	License(s) , Ownership records issued by Government Authorities and Court orders	-	Concerned Deptt.
9.	Press releases/Public filings made or Disclosures /correspondence made/received or any clarification given by the Company from time to time under the Listing Regulations , SEBI ICDR Regulations , SEBI Takeover Regulations , SEBI Insider	-	Secretarial Deptt. / Concerned Deptt.

	Regulations , Companies Act and other laws/ rules/regulations as applicable		
10.	Register of Directors and key Managerial personnel and their shareholding	Section 170 of the Companies Act, 2013	Secretarial Deptt.

8.3 Others

S. No.	Particulars	Provisions in law , if any	Responsibility
1.	Material events or information which has been disclosed to the stock exchanges under regulations 30 of the listing Regulations	To be hosted on the website of the Company for a minimum period of 5 years	Secretarial Deptt.
2.	Disclosure / notices of interest of directors	Minimum period of 5 years	Secretarial Deptt.

9. DESTRUCTION OF DOCUMENTS

The documents of the Company which are no longer required as per the time schedule prescribed in the Annexure A may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule mentioned in Preservation period . The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed below. The entries in the register shall be authenticated by the Authorised Person.

Specimen format of the register of documents disposed of /destroyed

Particulars of Document along with provisions of Law	Date and Mode of Destruction	Initials of the Authorised Person

10. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.