

Svaraj Trading and Agencies Limited

CIN: L51100MH1980PLC022315

Policy for Preservation of Documents [Pursuant to Clause 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

INTRODUCTION

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 have been notified by Securities & Exchange Board of India on September 02, 2015, which shall replace the existing Listing Agreement entered by the Company with the Stock Exchange.

Clause 9 of the Listing Regulations requires the Board of Directors of listed companies to frame a policy for providing framework for adequate protection and preservation of the documents of the Company as per the applicable statutory requirements.

Accordingly, the Board of Directors of Svaraj Trading and Agencies Limited has adopted this Policy on December 04, 2015 which shall come into effect with effect from December 04, 2015.

The Board may amend this Policy from time to time as they may deem fit and/or to incorporate any subsequent amendment(s)/modification(s) in the Listing Regulations with respect to matters covered under this Policy or otherwise.

I. DEFINITIONS

- **“Board of Directors”** or **“Board”** means the Board of Directors of Svaraj Trading and Agencies Limited as constituted/re-constituted from time to time.
- **“Company”** means Svaraj Trading and Agencies Limited.
- **“Listing Regulations”** means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- **“Policy”** or **“this Policy”** means Policy for Preservation of Documents.
- **“Stock Exchanges”** means the stock exchanges where the Company’s shares are listed.
- **“SEBI”** means Securities & Exchange Board of India.

The words, terms and expressions used in this Policy shall have the same meaning as given in Clause 2 of Chapter I of the Listing Regulations.

II. PRESERVATION OF DOCUMENTS

- A. Documents as per Annexure A and those which are required to be maintained under various Acts/Rules/Regulations applicable to the Company shall be maintained and preserved as per the provisions content therein.
- B. The Documents Preservation Schedule is annexed herewith as “**Annexure A**” for the guidance of the concerned departments of the Company.
- C. It shall be the responsibility of the concerned head of department to keep the annexed Documents Preservation Schedule updated from time to time to ensure that it is in compliance with the various Acts/Rules/Regulations applicable to their respective Departments and for this purpose, they shall communicate any changes desired in the abovementioned Schedule to the Company Secretary.
- D. In case of any inconsistency in the annexed Documents Preservation Schedule and the provisions of various Acts/Rules/Regulations applicable to the Company, such provisions shall prevail.
- E. The documents mentioned above can be maintained by the Company in physical or electronic or digital mode, if permitted under the applicable Acts/Rules/Regulations.
- F. The concerned head of department shall keep in his custody the documents which are of important and/or confidential nature and list of the same shall be maintained in a Register to be kept in his/her custody and he/she shall be responsible for the preservation of the same. The said documents along with the Register shall be handed over by him/her to the successor in the event of such head of department leaving the Company/Department.

III. DESTRUCTION OF DOCUMENTS

- A. After the expiry of the preservation period specified in the annexed Documents Preservation Schedule, such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval of Chairman & Managing Director of the Company. The records of the documents destroyed shall be maintained by the concerned department and shall be produced whenever required by the concerned authority/auditors.
- B. In case any specific procedure is prescribed under applicable Act/Rule/Regulation for destruction of the documents, the same shall be followed by the Company.

C. Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed-off finally.

IV. ARCHIVAL OF DOCUMENTS

Documents mentioned in the annexed Documents Preservation Schedule which are not required regularly can be archived by the concerned department in the following manner:

- a) Documents to be archived should be kept in the storage locations earmarked by the Company for the purpose in secured place or cupboard having access only by the authorised personnel. If consider appropriate, services of external archival agencies may be utilized;
- b) Documents should be boxed and the box should be labelled with the reference number and list of the files/documents. List of documents contained in the box should be kept inside the Box and shall also be kept by the concerned department;
- c) Documents should be stored in a way that preserves their integrity and readability and restricts access to authorized personnel only;
- d) The medium used to store documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available to the Auditors or Regulatory Authorities upon request;
- e) The concerned department head should maintain a record of documents archived, box reference number and storage location; and 6. Electronic records i.e. e-mails, files etc. should be archived as per IT Policy of the Company.

V. DISCLOSURES

The Company shall disclose this Policy on its website and a web link thereto shall be provided in the Annual Report.

ANNEXURE A**DOCUMENTS PRESERVATION SCHEDULE**

Sr. No.	Type of Document	Preservation Period	Concerned Department
1.	Common Seal	Permanent	Secretarial
2.	Certificate of Incorporation	Permanent	Secretarial
3.	Statutory Registers	Permanent	Secretarial
4.	Register of Members	Permanent	Secretarial
5.	MCA Forms Permanent	Permanent	Secretarial
6.	Scrutinizers Reports	Permanent	Secretarial
7.	Annual Audit Reports and Financial Statements	Permanent	Secretarial
8.	Annual Returns	08 years	Secretarial
9.	Attendance Register	08 years	Secretarial
10.	Attendance Register	08 years	Secretarial
11.	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	08 years	Secretarial
12.	Office copies of Notice of General Meeting and related papers	08 years	Secretarial
13.	Insurance Policies	4 years	Finance & Accounts Department
14.	Annual Plans and Budgets	4 years	Finance & Accounts Department
15.	Books of Accounts	08 years	Finance & Accounts Department
16.	Income Tax Returns, assessment records and related documents	08 years	Finance & Accounts Department
17.	Tax Returns and other documents related thereof for Indirect Taxation	08 years	Finance & Accounts Department
18.	Court Orders	Permanent	Legal
19.	Original Property Purchase and Sale Agreement, ownership documents and other related papers and documents	Permanent	Legal
20.	Litigation files and related documents	3 years after the close of litigation	Legal
21.	Contracts, Agreements and Related	8 years after termination of	Legal

	Correspondence	completion of contracts	
22.	Employee records, pay roll data, leave records and documents/papers related to Human resources	8 years	Legal
23.	Licence, permission grants issued by Government or any other authorities	Permanent	Legal
