



Policy for Preservation of Documents

1. Introduction:

This policy (hereinafter referred to as the “**Policy**”) shall be called "Preservation of Documents and Archival Policy" of Shakun Polymers Limited (herein after referred to as “the Company”). This policy has been framed in compliance with the provisions of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "**SEBI Listing Regulations**") which requires every listed company to have a policy on preservation of documents. As per Regulation 9, a listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode. The Policy is framed in line with the existing provisions of SEBI Listing Regulations. Any future changes in the SEBI Listing Regulations will, ipso facto, apply to this Policy.

2. Purpose of the Policy

The purpose of this policy for preservation of documents is to ensure that the Company retains its official records in complete and accurate manner and in accordance with the requirements of all applicable laws and to ensure that official records no longer needed by the Company are discarded at the proper time. This policy provides guidelines concerning the length of time official records should be retained under ordinary business circumstances. No directors, officer or employee of the Company shall knowingly destroy a document with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case. This policy covers all records and documents of the company.

3. Policy:

The Policy has been approved by the Board of Directors in their meeting held on 02.04.2018 and shall come into effect from such date.

The Policy is in conjunction with any extant policy of the corporation in the matter of preservation of documents/records retention and also subject to the provisions of other laws viz., Right to Information Act, 2005, The Public Records Act, 1993, or any other law as applicable.

4. Records Covered:

This policy applies to all official records generated in the course of the Company's operations, including but not limited to:

- Typed or printed hardcopy (i.e. paper) documents,
- Electronic records & documents (e.g. email, web files, text files, PDF files etc.),
- Video or digital images,
- Graphic representation,
- Electronically stored information contained on network servers and/ or document management systems,
- Recorded audio material (e.g. voicemail),
- Other kind of records.

5. Administration:

5.1 Record Preservation Schedule:

Attached to this policy is a record preservation schedule (annexure a) that is approved as the maintenance and preservation schedule for official records of the Company. It shall be the duty of the Head of each Department to administer this Policy and implement reasonable processes and procedures concerning the record preservation schedule.

5.2 Distribution of Policy to Employees and Officers:

The Head of the Department will arrange for every officer and employee who may have control over or responsibility for the Company's documents to receive a copy of this Policy and ensure that he or she has received a copy of this Policy, has read and understood it and has agreed to comply with it.

6. Record Storage Procedures:

6.1 Organization of Records:

In order to facilitate administration of this policy, where practicable, the Company's official records should generally be organized and stored according to general categories in a manner that best facilitates the efficient administration of the Company's operations where appropriate. Records within each category should generally be organized and stored in chronological order or by time period (e.g. by month or year)

6.2 Dating of Records:

Categories of records not required to be retained on a permanent basis (according to the record preservation schedule) should be maintained by the date or conspicuously dated to enable such records to be easily identified for destruction at the end of the record preservation period specified in the Record Preservation Schedule.

6.3 Confidentiality of Record:

Records containing confidential information should be labeled and/ or stored in a manner to limit access to those employees or other individuals with authorization to view such records. The Company provides its employees with email as a tool for performing its employees' work functions. While the Company understands that employees may use their email to conduct personal business, employees should be aware that they have no expectation of privacy for any information or communications contained in work-related email accounts. The Company reserves the right to review any of the Company's email at any time.

6.4 Electronic Storage Systems:

The Company Secretary of the Company is authorised to develop and implement a system for maintaining the Company's records via an electronic storage system that either images hardcopy records or transfers computerized records to electronic storage media (e.g., hard drives, storage area networks or optical media such as CDs and DVDs).

7. Confidentiality and ownership:

All records are the property of the Company and employees are expected to hold all business records in confidence and to treat them as the Company's assets. Records must be safeguarded and may be disclosed to parties outside of the Company only upon proper authorization. Any subpoena, court order or other request for documents received by employees or questions regarding the release of the Company's records must be directed to the Head of the respective Department, prior to the release of such records. Any records of the Company in possession of an employee must be returned to the employee's successor or person in charge or the Head of the Department, upon termination of employment.

8. Kind of Documents/ Records and time period for preservation:

The company shall maintain and preserve documents as specified hereunder:

Category (A): The documents of permanent nature (listed in **Annexure-1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company

Category (B): The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in **Annexure-2**) shall be preserved by the Company for the term not less than eight year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided, that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

9. Destruction of Documents

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the board of directors/ head of the department.

This applies to both physical and electronic documents.

10. Amendments to the Policy:

The Board of Directors shall alter, amend or modify the clauses of this Policy from time to time in line with the requirement of the SEBI Guideline or any other rules, regulation etc., which may be amended and applicable from time to time.

Annexure – 1

Documents whose preservation shall be permanent in nature:

Sr. No.	Nature of Document(s)
1.	All documents and Information originally filed with ROC for Incorporation of Company
2.	Memorandum of Association and Articles of Association as originally filed and updated from time to time
3.	Register of Members
4.	Index of Members
5.	Minutes of General Meeting
6.	Minutes of Board Meeting
7.	Minutes of various Committee Meetings
8.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

Annexure – 2

Documents with preservation period of not less than eight years after completion of the relevant transactions:

Sr. No.	Nature of Document(s)
1.	Books of Accounts
2.	Annual Return(s)
3.	Register of Debenture holders
4.	Index of Debenture holders
5.	Statutory Registers
6.	Tax related records and documents
7.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time