



## **POLICY ON PRESERVATION OF DOCUMENTS**

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**Approved By: Board of Directors**

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## I. Scope

A policy on preservation of Documents (defined below) would ensure safe keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, is formulating this policy on preservation of the Documents that are required to be maintained under various Applicable Laws and to guide the employees of the organization on the maintenance & handling the documents efficiently of any Documents.

It not only covers the various aspects on preservation of the documents, but also the lays down the process of safe disposal/destruction of the Documents.

## II. Definitions

- i. “**Act**” means the Companies Act, 2013, including the rules, notices, circular, amendments notified thereunder including any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.
- ii. “**Applicable Law**” means any law, rules, circulars, guidelines or standards issued by the various regulators, including but not limited to the Ministry of Corporate Affairs, SEBI, the Institute of Company Secretaries of India (ICSI), the Income Tax Department, the central Board of Indirect Tax & Customs, the Directorate General of Foreign Trade (DGFT), or any other law under which the preservation of the Documents has been prescribed.
- iii. “**Authorised Person**” means any person duly authorised by the Board.
- iv. “**Board**” means the Board of directors of the Company or its Committee.
- v. “**Company**” means Sajjan India Limited.
- vi. “**Current Document(s)**” means any Document, that still has an ongoing relevance with reference to any ongoing transaction, litigation, proceedings, complaint, dispute, contract or any like matter.
- vii. “**Document(s)**” includes papers, formulae, recipes, notes, agreements, MOUs, LOIs, notices, summons, challans, advertisements, requisitions, affidavits, 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.
- viii. “**Electronic Record(s)**” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- ix. “**Electronic Form**” means any contemporaneous electronic device such as computer, laptop, tape, server, 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.
- x. “**Maintenance**” means keeping Documents, either physically or in Electronic Form.
- xi. “**Preservation**” means to keep in usable and retrievable form, in good order and to prevent from being altered, damaged, or destroyed.

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

## III. Classification

This policy sets the standards for managing, storing and preservation of Documents of the Company broadly classified in the following three categories:

- A. The Documents of a permanent nature shall be maintained and preserved permanently by the Company, subject to the modifications, amendments, additions, deletions, or any changes made therein from time to time. These documents are listed in **Annexure – I** attached hereto.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- B. The Documents to be maintained and preserved for the term not less than eight years after completion of the relevant transactions, subject to the modifications, amendments, additions, deletions, or any changes made therein from time to time. These documents are listed in **Annexure – II** attached hereto.

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

- C. The Documents to be maintained and preserved for such period after completion of the relevant transactions as specified in the list of documents attached hereto as **Annexure-III**, after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for same tenure as relevant to the principal documents.

#### **IV. Hosting on Company Website**

The Company shall disclose on its website all such events or information which has been disclosed to the concerned Stock Exchanges in respect of this policy and such disclosures shall be hosted on the website of the company for a minimum period of 5 years and thereafter as per the archival policy of the company.

#### **V. Modes of preservation**

- i. The Documents may be preserved in –
  - (i) Physical form; and/or
  - (ii) Electronic Form
- ii. The employee of the Company creating any Document shall be generally expected to observe the compliance of requirements of the Applicable Law and preservation thereof as per this Policy.
- iii. 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.
- iv. The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation to ensure integrity of the Documents and prohibit unauthorized access.
- v. All digital and physical records to be saved at the registered / corporate office or such other location as approved by the Board and no physical records can be migrated from one location to another without the permission of CFO or the Company Secretary.
- vi. A reproduction of any original record on microfilm or on any other medium shall be certified by a Director or the CFO or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.

#### **VI. Custody of the Documents**

Subject to the Applicable Law, the custody of the documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, other storage devices or such other Documents and devices in his possession under the Policy to such other person as intimated to him/her by the Human Resource department or his/her immediate supervisor.

## **VII. Authority to Board**

The Board shall have the authority for approval of this policy in pursuance in pursuance to the applicable laws. The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

## **VIII. Destruction of Documents**

- 1) Destruction as a normal administrative practice can be undertaken for such records that are temporary in nature, duplicated, unimportant or for short-term use only and does not fall under the definition of Documents mentioned in this Policy. This applies to both Physical and Electronic Documents.
- 2) The Document(s) defined under this Agreement can be destroyed only on the completion of the relevant or prescribed period and with the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved, by such person as authorized by the Board.
- 3) A register of the Documents disposed/destroyed shall be maintained in the format as specified in Annexure-IV attached hereto.
- 4) The entries in the register shall be authenticated by the Authorised Person.
- 5) The register shall be maintained in the custody of Company Secretary and in his / her absence by the Assistant Company Secretary.
- 6) The format of the register shall be in accordance with Annexure-IV.

## **IX. Conversion of the form in which the Documents are preserved**

- 1) The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- 2) This will be done after obtaining prior approval of the WTD & CEO or the CFO.

## **X. Interpretation**

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard(s) governing the Company, the law, rule, regulation or standard(s) will take precedence over this policy and procedures until such time this policy is changed to conform to such law, rule, regulation or standard(s).

Specified Orders: Notwithstanding anything contained in this Policy, if a higher period of retention of documents is stated in any Act / Statute or prescribed by Statutory Authorities in the form of orders, direction or otherwise, such higher period becomes applicable.

## **XI. Effective Date**

The Policy as approved by the Board of Directors shall be effective from February 03, 2023.

## **XII. Compliance**

All Documents must be properly classified, filed, labeled, indexed and stored by the respective departments.

The head of each concerned department at respective locations viz plants / units / branch/ Corporate office and other places shall ensure compliance with this Policy.

The departmental head shall affirm compliance of this Policy as part of quarterly/annual legal compliance report / certificate of compliance of Applicable Laws in specified template to the Secretarial and Legal function for reporting to the Board. Failure to comply with this Policy may result in disciplinary action.

Clarification with respect to this Policy can be sought from Company Secretary and his/ her absence, Asst. Company Secretary, and / or Chief Financial Officer (CFO), who is in charge of administering, enforcing and updating this Policy.

## **XIII. Amendments**

The Company may amend the Policy as and when it deems necessary either pursuant to any change in law or otherwise. The Company shall be free to devise and implement any supplementary or other policies and guidelines in respect hereof for better implementation of this Policy.

The Chairman is authorized to amend this Policy to be consistent with the prevailing provisions of Acts, rules, guidelines, regulations and in accordance with administrative/ business requirements of the Company.

**Annexure I**  
**Records to be preserved permanently**

Sr. No.	Records
1.	Certificate of incorporation
2.	Certificate for commencement of business
3.	Memorandum and Articles of Association
4.	Permanent Account Number [PAN]
5.	Tax Deduction Account Number [TAN]
6.	Goods and Service Tax, Export/Import code registration certificate(s) Registration Certificates obtained under various other Statutes
7.	Pleadings, opinions, memoranda, orders passed by any court or tribunal, judgments, interim orders, documents relating to cases pending in any court or tribunal or any other authority empowered to give a decision on any matter shall be retained till Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded
8.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
9.	Agenda items and approval note for the agenda items along with relevant annexure thereto pertaining to the meeting of the Board / Committee of the Board
10.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
11.	Register and Index of Members
12.	Register of Contracts as per Companies Act, 2013
13.	Register of Charges as per Companies Act, 2013
14.	Register of Investments as per Companies Act, 2013
15.	Documents relating to any property of the Company, property tax, delegation of powers, all Policies / Policy Guidelines of the Company framed under various regulations
16.	Payroll related records such as Final Settlements, Group Saving Linked Insurance Life Insurance Corporation, Provident Fund, Employees' Pension Scheme / Employees Family Benefit Scheme
17.	Authorization / licenses obtained from any statutory authority
18.	Policies of the Company framed under various regulations
18.	Register of disposal of records
19.	Certificates obtained from various statutory authorities
20.	Register of Inter Corporate Loans and Investments as per section 186 of the Companies Act, 2013.
21.	Intellectual Property Rights and other licenses documents
22.	All such licenses and permissions which are required to be maintained under applicable statutes
23.	Such other records as may be required under any law from time to time

## Annexure II

### Records to be preserved for minimum period of eight years.

Sr. No.	Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Register of Debenture Holders or any other security holders along with the index from the date of redemption of debentures or securities.
3.	Annual Returns as per Companies Act, 2013
4.	Register of Deposits as per Companies Act, 2013
5.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
6.	Annual financial statements including: - Annual accounts - Directors' report - Auditor's report
7.	Vouchers / Voucher register and books of accounts as defined under subsection 13 of section 2 of the Companies Act, 2013
8.	Income Tax Returns filed under Income Tax Act, 1961
9.	All notices in form MBP — 1 received from Directors and KMPs along with any amendment thereto
10.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
11.	Copy of newspaper advertisement or publications
12.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.  Records under FEMA / Prevention of Money Laundering (Maintenance of Records) Rules, 2005 shall be retained for a period of Ten (10) years.
13.	Compliance Reports received from any statutory authority
14.	Correspondences made with any statutory authority
15.	Register of Power of attorneys, if any
16.	Forms and returns filed with RBI/MCA or with any other statutory authority
17.	Transfer Pricing documents and Information under relevant provisions of Income Tax Act, 1961
18.	Employment /Personnel Record: office order file, recruitment, employment and personnel information, performance reviews, memoranda and correspondence, complaints, actions taken, transfers, postings, re-designations, Promotion orders, Appraisal records/ Assessment sheets, Leave records till the employees on rolls or eight (8) years from the date of separation whichever is higher.
19.	All documents relating to Press Releases. Press Release shall include, but shall not be limited to, any intimation given to the press regarding financial results, Board and General Meetings, performance of the Company, and other statutory announcements.
20.	Property documents, where the rights in such property cease to exist
21.	Contracts, after the expiry of the term
22.	Licenses, post expiry of tenure of such License
23.	Interim Orders shall be retained till a Final Order is received or for a period of eight (8) years whichever is higher



24.	Audio-Visual tape recordings or other electronic mechanism in connection with attendance of directors at Board Meetings/Committee Meetings of the Board through video conferencing facility. To be preserved at least before the completion of Audit for that particular year in accordance with Rule 3 of Companies (Meetings of Board) Rules, 2014. Thereafter these can be destroyed with the approval of the Board.
25.	E-mails: E-mail Archival Policy of the Company will be applicable to all the emails of employees under which, inter alia, users' emails are archived automatically for backup and retained in the Company for minimum three (3) years. Account holders are responsible for maintaining a copy of the item in the appropriate file if the time is required to be retained beyond three (3) years. Keeping in view the documents retention and audit requirements, all E-mails from internal and external sources that may be considered to be important having significant impact on business transaction should be archived for such relevant period as may be applicable by either: (i) printed in hard copy and kept in the appropriate file; or (ii) Downloaded to a computer file and kept electronically or on disk/tape/server as a separate file.

**Annexure III**

**The following categories of Documents may be destroyed as normal administrative practice**

<b>Sr. No.</b>	<b>Records</b>	<b>Approving Authority</b>
1.	The books and papers of the Amalgamated/Transferor Company	Not to be disposed of without the prior permission of the Central Government
2.	<ul style="list-style-type: none"><li>• Brochures</li><li>• Copies of press cuttings, press statements or publicity material;</li><li>• Letters of appreciation or sympathy, or anonymous letters; • Requests for copies of maps, plans, charts, advertising material</li><li>• Facsimiles where a photocopy has been made;</li><li>• Telephone/Fax message;</li><li>• Drafts of reports, correspondence, speeches, notes, spread sheets, etc.</li><li>• • Routine statistical and progress reports compiled and duplicated in other reports;</li></ul>	After obtaining prior approval of WTD & CEO or the CFO or the Company Secretary

Annexure IV

Format of the register of Documents disposed/destroyed

<b>Brief particulars of the Documents destroyed</b>	<b>Identification mark of the document, if any</b>	<b>Tenure as per Applicable Law</b>	<b>Tenure for which the Document preserved</b>	<b>Date of Board's approval for disposal / destruction</b>	<b>Date of disposal/destruction</b>	<b>Mode of Destruction</b>	<b>name and signature of the person conducting disposal / destruction</b>	<b>name and signature of the person evidencing such destruction</b>
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