



**Shree Ajit Pulp And Paper Limited**  
**(CIN: L21010GJ1995PLC025135)**

***Document Retention And Archival Policy (As per Regulation 30 (8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015***

*(Reviewed by Board of Directors at its meeting held on December 24, 2024)*

➤ **Background:**

In terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI (LODR) Regulations, 2015”) listed entities is required formulate an archival policy. It is in this context that the policy on archival of documents (“Policy”) is being framed and implemented.

➤ **Objective of the Policy:**

The objective of this policy is to comply with Regulation 30(8) of the SEBI (LODR) Regulations, 2015, as mentioned below:

*“The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the Companies website of the listed entity for a minimum period of 5 years and thereafter as per archival policy of the listed entity, as disclosed on its website.”*

➤ **Archival Policy and Purpose:**

In accordance with the provisions of the aforesaid regulation, the Company shall ensure that all the information shall be hosted on the Company’s website ([www.shreeajit.com](http://www.shreeajit.com)) for a period of 5 years and thereafter will be archived for a period of 1 year.

This Policy represents the policy of **Shree Ajit Pulp And Paper Limited** (“the Company”) with respect to the retention and destruction of documents and other records, both in hard copy and electronic media (which may merely be referred to as “documents” in this Policy).

Purpose of the Policy include:

- a. retention and maintenance of documents necessary for the proper functioning of the Company as well as to comply with applicable legal requirements;
- b. destruction of documents which no longer need to be retained; and
- c. guidance for the Board of Directors, officers, staff, and other constituencies with respect to their responsibilities concerning document retention and destruction.

Notwithstanding the foregoing, the Company reserves the right to revise or revoke this Policy at any time. Please be aware that "Documents" includes not only Documents in paper form, but all digitally stored information including e-mails. These rules and procedures apply to all computers and other electronic devices provided to you by the Company for use in the business of Company, regardless of whether those computers or devices are used on the Company premises or elsewhere.

➤ **Roles and Responsibilities:**

This policy is applicable to all departments and units of the Company. Each employee shall abide by the Policy. The Authorised Person shall guide the employees and ensure that they identify and classify documents and take appropriate action with regard to their preservation in accordance with this Policy. The Authorised Person shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

➤ **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 of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Disc, other storage devices or such other Documents and devices in his possession and such authorised person taking possession of documents needs to change the password.

➤ **Destruction of Documents:**

After the expiry of the retention period, the preserved documents as classified above may be shredded or destroyed in such mode under any instructions approved by the Authorised Person. However, for secrecy, the Authorised Person should ensure that no preserved document in physical mode, after the retention period, be sold out in the market or reused. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

Where there is no such requirement of the statutory retention period, the documents may be retained for such period and then destroyed, as deemed fit by the Authorised Person. In the event the Company is served with any Notice for documents from any of the statutory authorities or any litigation is commenced by or against the Company, then the destruction of documents which are subject matter of notice / litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Authorised Person shall immediately inform all concerned employees of the Company for suspension of further destruction of documents.