

Shree Ajit Pulp and Paper Limited

Policy on preservation of the Documents

1. PURPOSE AND OBJECTIVE OF THE POLICY:

This Policy is formed pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) for preservation of documents/records maintained by the Company either in physical mode or electronic mode.

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the listing regulations and as per Policy framed in compliance with the listing 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.

2. DEFINITION:

In this Policy, unless the context otherwise requires:

- a. **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- b. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- c. **“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.

d. **“Current”** means running matter or whatever is at present in course of passage.

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.

3. PRESERVATION OF DOCUMENTS:

The Documents and records of the Company required to be maintained under listing regulations shall be classified in two categories as below:

- a) Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company mentioned in **Category A**.
- b) Documents shall be preserved for a period of not less than 8 years after completion of relevant transaction mentioned in **Category B**.

Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

Category A (Permanent)	Category B (period not less than 8 years)
Certificate of incorporation	Books of accounts and financial Statements
Common Seal	Annual Reports
Memorandum and Articles of Association as amended from time to time	Consent and Resignation Letters received from the Directors
Statutory registers maintained under the Companies Act, 2013	Declaration by directors under section 164 of the Companies Act, 2013
Register of members, foreign register of members	Instrument relating creation or modification of Charges
Register of Charges	Declaration by directors under section 184 of the Companies Act, 2013
Register of renewed and duplicate share certificate	Advertisements published
Minutes book	Attendance registers, Notices, Agenda, Notes on agenda and other paper related to meetings.
Scrutinizers' Report	Annual Returns

License & Permits	Such other documents as prescribed under the applicable laws to the Company
Any other documents as prescribed under the applicable laws to the Company	

4. MODE 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.

5. DISPOSAL AND DESTRUCTION OF RECORDS:

After the expiry of the statutory retention period, the preserved documents may be destroyed, destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

6. Amendments:

The Board shall have power to amend any of the provisions of this policy, substitute any of the provisions with a new provision or replace this policy entirely with a new policy according to subsequent modification(s)/amendment(s) to regulation.