

SHREEOSWAL SEEDS AND CHEMICALS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. Legal Framework

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all the listed entities, one of the common obligation for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

The Board of Directors of SHREEOSWAL SEEDS AND CHEMICALS LIMITED (the “Company”) is obliged to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

This Policy will be applicable to the Company with effect from 23rd October 2018.

2. Definitions

“Board” means “Securities and Exchange Board of India.”

“Company” means “SHREEOSWAL SEEDS AND CHEMICALS LIMITED”

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

“Documents” shall mean all papers, records, files, books, tapes, electronic storage devices including data in computer systems, created or retrieved and maintained by the Company or person pursuant to the transactions of the business or the conduct of affairs and kept as evidence of such activity and the like, as required to be maintained under any law or regulation for the time being in force.

“Document keeping” means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

“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.

“Listing Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) and any amendments thereto.

“Maintenance” means keeping documents, either physically or in electronic form.

“Policy” or “This Policy” means, “Policy on Preservation of Documents”.

“Preservation” means to keep the documents preventing them from being altered, damaged or destroyed.

“Register” means a register maintained under the Companies Act, 2013 or the SEBI Act.

3. Objective

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company’s approach to preserve them. A good document preservation program is fundamental to the Company’s commitment to administrative efficiency, transparency and accountability.

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

A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

The documents of a permanent nature (listed in **Annexure A**) 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.

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

B. DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION:

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure-B**) shall be preserved by the Company for the term not less than eight years 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 a term not less than eight years

Provided further that the Company may keep the documents as specified above in an electronic mode

4. Maintenance Of Documents

Every member of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

5. Roles & Responsibilities

The respective Departmental Heads of the Company 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.

6. Destruction Of Documents

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the Department Head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Department Head for the purpose. Inspection of this register is restricted. Specimen format of the register of documents disposed-off / destroyed is attached in Annexure-C to this policy.

This applies to both Physical and Electronic Documents.

7. Amendments

The Board may subject to the applicable laws amend any clause(s) or substitute any of the clause(s) with the new clause(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

ANNEXURE – A

A. PERMANENT PRESERVATION:

- a) Common Seal,
- b) Minutes books of Board, General Meetings and Committee Meetings,
- c) Statutory Registers,
- d) License and Permissions,
- e) Statutory Forms and disclosures except for routine compliance,
- f) Scrutinizers' Report,
- g) Register of Members and
- h) Index of Members.

ANNEXURE – B

B. TEMPORARY PRESERVATION UPTO 8 YEARS:

- a) Annual Returns,
- b) Board Agenda and supporting documents,
- c) Attendance Register,
- d) Office copies of Notice of General Meeting and related papers,
- e) Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,
- f) All notices pertaining to disclosure of interest of directors,
- g) Instrument creating a charge or modification,
- h) Books of accounts, financial statements etc. and
- i) Register of debenture holders or any other security holders.

ANNEXURE – C

Specimen format of the register of documents disposed-off / destroyed

PARTICULARS OF DOCUMENT ALONG WITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON