

**SANGHI INDUSTRIES LIMITED**  
**Policy on Preservation of Documents**

## SANGHI INDUSTRIES LIMITED

### Policy on Preservation Of Documents

#### 1. PREFACE AND OBJECTIVE

Sanghi Industries Limited ("Company"), being a listed entity, is obligated to frame a policy for preservation of documents in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI-LODR). As per Regulation 9, the 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.

In accordance with the above Regulation 9, the Company has framed a Policy for Preservation of Documents (hereinafter the "Policy"). The Policy is framed in line with the existing provisions of SEBI-LODR. Any future changes in the SEBI-LODR will, ipso facto, apply to this Policy. The Policy has been approved by the Board of Directors in its meeting held on 11<sup>th</sup> February, 2016.

#### 2. EFFECTIVE DATE

The Policy shall be effective from 11th February, 2016.

#### 3. DEFINITION

"**Act**" shall mean the Companies Act, 2013 and the Rules framed there under, including any modifications, clarifications, circulars or re-enactment thereof.

"**Board of Directors**" or "**Board**" means the Board of Directors of Sanghi Industries Limited, as constituted from time to time.

"**Company**" means Sanghi Industries Limited.

"**Compliance Officer**" means Company Secretary of the Company.

"**Electronic Form**" shall mean any record/documents/information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device as permitted by the applicable law for the time being in force.

"**Key Managerial Personnel**" (KMP) means KMP as defined under the provisions of Companies Act, 2013 as amended from time to time.

"**Policy**" means Policy on Preservation of Documents.

"**Documents**" shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

**"Regulations"** mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, in the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other applicable laws or regulations to the extent applicable to the Company and as amended from time to time

#### **4. DOCUMENTS TO BE PRESERVED**

This Policy sets the standards for preservation of documents of the Company, broadly classified in the following categories, which may be preserved, in physical and/or electronic mode.

##### **(i) Category A – Documents Whose Preservation Shall Be Permanent In Nature**

The Company is required to maintain and preserve permanently all those documents, certificates, statutory registers that may be required to be preserved permanently in accordance with the provisions of Companies Act, 2013, SEBI Regulations and other relevant acts, rules, regulations guidelines, circulars, notification etc. as may be applicable to the Company from time to time.

##### **(ii) Category B – Documents To Be Preserved For Not Less Than Eight Years After Completion Of The Relevant Transaction.**

The Company is required to maintain and preserve all those documents, certificates, statutory registers that may be required to be preserved in accordance with the provisions of Companies Act, 2013, SEBI Regulations and other relevant acts, rules, regulations guidelines, circulars, notification etc. as may be applicable to the Company from time to time for a period of not less than 8 years from the completion of relevant transactions.

##### **(iii) Category C – General**

In addition to the documents mentioned in Category 'A' and 'B' above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing Rules/ Procedures/ Practices of the Company or as per the applicable Statutory/ Regulatory provisions in this regard.

#### **5. RESPONSIBILITY**

The respective departmental heads of the Company will be responsible for maintenance, preservation and destruction of the documents in respect of areas of operations falling under their charge of each of them in terms of this policy.

#### **6. MODE OF PRESERVATION**

Documents may be preserved either physically or in electronic form as permitted by the law for time being in force.

## **7. DESTRUCTION OF DOCUMENTS**

The documents preserved may be reviewed every year or according to the need by the respective departmental Head and necessary action is to be taken for destroying documents which are due for disposal.

Preserved documents may be destroyed in such mode under instructions and approved by the Chairman and Managing Director. Destruction of documents as a normal administrative practice will also be followed for documents which are duplicate / unimportant / irrelevant. This applies to documents maintained in both physical and electronic form.

## **8. GENERAL**

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

## **9. AMENDMENT TO THE POLICY**

The Chairman and Managing Director is authorized to amend or modify this Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

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