



SANGAL PAPERS LIMITED

CIN- L21015UP1980PLC005138

Reg. Office: 22 Km, Meerut-Mawana Road, Mawana, Meerut,
UP-250401

POLICY ON PRESERVATION OF DOCUMENTS

Ref. No.:- PPD/NOV2015/21001

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 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 is to formulate and put in place a policy for preservation of documents. The Board of Directors of SANGAL PAPERS LIMITED (CIN-L21015UP1980PLC005138) (the “Company”) is obliged to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. **Definitions:**

Applicable Law

means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, Ministry of Corporate Affairs and The Institute of Company Secretaries of India or any other if any, under which the preservation of the Documents has been prescribed.

Authorised Person

means any person duly authorised by the Board.

Board

means the Board of directors of the Company or its Committee.

Current Document(s)

means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

Document(s) refers to papers, notes, agreements, notices, advertisements, requisitions, 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.

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.

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.

Maintenance

means keeping Documents, either physically or in Electronic Form.

Preservation means to keep in good order and to prevent from being altered, damaged, tempered or destroyed.

Regulations

means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 and other, if any.

3. Scope and Objective:

The Scope of such policy on the Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015("Regulations"), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents. The basic objective of this policy is to have a binding framework for the preservation of documents of the company, which is keep in permanent basic and/or for eight year durations and/or duration as per conditions and situations. Which are documents approved by the Board of Directors of the company.

4. Classification:

The preservation of Documents shall be done in the following manner:

Class I:- Such class documents will be maintain on permanents basic.

Class II:- Such Class documents will be maintain on time limit basic for applicable law on , then for such period as the documents pertains to a matters which is "Current".

In case of any other documents, for such period, as a competent officer of the company required to handle or deal with the document takes a consideration view about its relevance; provided that generally speaking, a document may be preserve for a period of 8 years from the date on which the document was originated.

Documents list as per Annexure- I

5. Modes of preservation of Documents:

The Documents of the Company may be preserved in modes of Electronic Form and Physical Form. The Board of Directors of the Company shall be required to preserve the documents under these polices.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endanger the content, authenticity, utility, or accessibility of the documents.

6. Custodian of the Document:

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 Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise one or more person(s) as it may deem fit for custody of the Documents.

7. **Authority for approval of Policy:**

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via the Regulations.

8. **Authority to make alterations to the Policy:**

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.

9. **Destruction of Documents:**

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents. The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice.

Such list of documents are,

- (a) catalogues,
- (b) copies of press cuttings, press statements or publicity material;
- (c) letters of appreciation or sympathy, or anonymous letters;
- (d) requests for copies of maps, plans, charts, advertising material etc.
- (e) telephone message and E-message,
- (f) drafts of reports, correspondence, speeches, notes, spread sheets, etc,
- (g) routine statistical and progress reports compiled and duplicated in other reports,
- (h) other documents which is decided by the appropriate authority.

The format of the register has to be in accordance with Annexure II

10. **Interpretation:**

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

Annexure I

Class I:- These Documents will be maintained on permanent basis as per applicable Law, Rule and Regulation. Such are

- (a) The memorandum and articles of the company.
- (b) Affidavit from the subscribers to the memorandum and from persons named as the first directors.
- (c) Register of members, The foreign Register of member.
- (d) Books and Documents relating to the issue of share certificates, including the blank forms of share certificates.
- (e) Minutes book of general meeting.
- (f) Minutes of Board meeting.
- (g) Register of Charges.
- (h) Annual Report.

Class II:- this document will be maintain upto Eight year (8) from the relevant date. Such are

- (a) Register of debenture holders or any other security holders (if any).
- (b) Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto.
- (c) All notices pertaining to disclosure of interest of directors or others.
- (d) All certificates surrendered to a company.
- (e) Register of deposits (if any)
- (f) Office copies of Notices, scrutinizer's report, and related papers (as long as they remain current or for 8 financial years), whichever is later.
- (g) Register of Charges other than class one.
- (h) Other documents as per specified by the relevant authority.