

Sudarshan Preservation of Documents Policy

POLICY FOR (PRESERVATION OF DOCUMENTS)

INTRODUCTION:

The Board of Directors of Sudarshan Chemical Industries Limited (SUDARSHAN / the Company) have adopted this Policy as required under Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, (Listing Regulations). This Policy will be applicable to the Company effective December 1, 2015.

SCOPE:

This Policy envisages the procedure governing preservation of documents as required to be maintained under the various statutes viz. Companies Act, 1956, Companies Act, 2013 and Rules issued there under from time to time, applicable Secretarial Standards, Listing Regulations, SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 and any other applicable regulations under SEBI Act, 1992. And amendments thereto from time to time (hereinafter referred as 'Act / Regulation').

DEFINITIONS:

1. "Documents" means forms, registers, returns, reports, papers, minutes, notices, presentations or such other record maintained by the Company under applicable provisions of the Act/Regulation.
2. "Maintenance" means keeping Documents. Either physically or in electronic mode as may be permitted under Act/Regulation for the time being in force including authentication and custody of such Documents.
3. "Preservation" means to keep in good order, to prevent from being damaged or destroyed.

LIST OF DOCUMENTS TO BE PRESERVED:

The Company Secretary shall ensure the preservation of the Documents as categorized in this Policy.

The Documents to be preserved are categorized as follows based on provisions of the Act/Regulation and its essentiality for the smooth, efficient and systematic functioning of the Company.

1. Documents to be preserved permanently - Annexure I
2. Documents to be preserved for at least 8 years after completion of the relevant event/transaction - Annexure II
3. Documents to be preserved for specified period - Annexure III

Notwithstanding the above, in case any such documents are required to be preserved in accordance with the directions of the court or if the matter is sub-judice then the concerned documents shall be preserved until such time the matter is conclusively disposed off.

DESTRUCTION OF DOCUMENTS:

The Documents may be destroyed after the expiration of the period mentioned in the Annexure. The Company shall maintain a register about brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Company Secretary of the Company.

AMENDMENT:

In case of any subsequent changes in the provisions of Act / Regulation, which makes any of the provisions in the Policy inconsistent with the Act or regulations, the provisions of the Act/ Regulation would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

Place: Pune 411 001

Date : 31st October, 2015

ANNEXURE I

Following documents shall be preserved permanently:

Sr. No.	Name of the Register/ Documents
1	Incorporation related documents
2	Register of Charges
3	Register and Index of Members (Equity and Preference separately)
4	Foreign Register of Members
5	Register of renewed and duplicate share certificates
6	Register of contracts / arrangements in which Directors are interested
7	Register of Directors/ Managing Directors/ Managers/Whole-time Directors/Secretary
8	Register of Directors' shareholding
9	Register of Director and KMP and their shareholding
10	Register of loans or investments made, guarantees given and security provided to other body corporate
11	Register of loans made, guarantees given, securities provided or investment made by the Company
12	Minutes of General Meetings and Board Meetings and Committee Meetings
13	Register of Investments not held in Company's name
14	All books and documents relating to issue of share certificate including blank forms of share certificates, in case of disputed cases
15	Maintenance of share certificate forms and related books and documents except blank forms of share certificates
16	Register of transfer of shares
17	Register of transfer of debentures, if any
18	Register of Transmission of shares and debentures
19	Register under respect of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 1997 and SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
20	Memorandum of Association and Articles of Association including amendments thereof
21	Court Orders for Corporate Restructuring, if any
22	Certificate of Incorporation, Certificate of commencement of business and other certificates issued by Registrar of Companies

ANNEXURE II

Sr. No.	Name of the Register/ Documents
1	Register of shares or other securities bought-back
2	Register of Debenture holders along with the Index, if any
3	Register of foreign debenture holders, if any
4	Register of Deposits
5	Register of allotment, if any
6	Register of payment of dividend, if any
7	Register of attendance of directors at meetings of the Board and Committees thereof
8	Register of proxies
9	Notice of disclosure by a director of his interest
10	Register of sweat equity shares
11	The books of accounts together with vouchers, records and papers relevant to any entry in the books
12	Books of accounts, other relevant books, papers and financial statements for each year
13	Annual Returns and all certificates and documents to be annexed thereto
14	Annual Return with all attachments
15	Cost records, cost statements and reconciliation statements
16	Copy of instrument creating charge
17	E-Forms and other documents filed with the Registrar of Companies
18	Annual Reports of the Company
19	Audit Reports of the Company

Following documents shall be preserved for 8 years after completion of the following transactions, namely:-

ANNEXURE III

Following documents shall be preserved as per the applicable Act, Rules and Regulations.

A. Documents to be preserved for period specified as per the applicable Act, Rules and Regulations.

Sr.No.	Name of the Register/ Documents	Period for which the Register/Documents are to be maintained
1	Ballot Papers and other related papers or register handed over by Scrutinizer appointed for Postal Ballot	Report and Office copies of the notices to be preserved until the resolution has been implemented or for 10 years Whichever is later?
2	Register of employees stock options	15 years from the date of Exercise of Options
3	Register including pre clearances etc. in respect of SEBI (Prohibition of Insider Trading) Regulations, 1992 / 2015:	5 years
4	Share certificates surrendered	3 years from the date on which the share certificates are surrendered
5	Maintenance of share certificate forms and related books and documents	For a period of not less than 30 years
6	Register under SEBI (Prohibition of Insider Trading) Regulations and other reports e.g., Pre clearance	5 years
7	Agenda for Board and Committee Meetings	10 years
8	Documents including presentations forming part of minutes	10 years

B. Documents to be preserved for which no period is specified as per the applicable Act, Rules and Regulations but will be preserved by the Company for a period of 8 years.

Sr. No.	Name of the Register/ Documents
1	Forms FCGPR filed with the Reserve Bank of India
2	Declarations from Directors under Companies Act, Code for Insider Trading. etc.
3	Power of Attorney given to Directors and KMP
4	Register of Agreements entered into with Directors / Managing Directors / Whole Time Directors
5	All Protected Disclosures in writing or documents along with the results of investigation relating thereto under Whistle Blower Policy shall be retained by the Company for 7 years
6	Register of documents executed under common seal
7	Register of records and documents destroyed
8	Details of Unpaid Dividend filed with Investor Education and Protection Fund
9	Documents filed with Stock Exchanges
10	Shareholding Pattern filed with Stock Exchanges
11	Register and Index of Beneficial Owners to be maintained by Depository under section 11 of the Depositories Act, 1996
12	Shareholders / Proxies Attendance Book
13	Register of power of attorneys/ probate/ letters of administration/ death certificate/ succession certificate
14	Register of dividend mandate
15	Register of Bank A/c particulars
16	Register of electronic clearing service
17	Register of fixed assets
18	Register of nominations
19	Register of share warrants
20	Register of inspection