

## **SOBHAGYA MERCANTILE LIMITED**

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### **POLICY ON PRESERVATION OF DOCUMENTS**

#### **1. INTRODUCTION:**

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), the Board of Directors (the “Board”) of Sobhagya Mercantile Limited has adopted this Policy for Preservation of Documents, as required under applicable regulations. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

#### **2. SCOPE:**

This policy shall govern the maintenance and preservation of documents as per the applicable statutory and regulatory requirements.

#### **3. OBJECTIVE OF THE POLICY:**

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

- i) To identify statutory records to be preserved.
- ii) To identify records to be maintained either for a period of eight years or permanently.
- iii) To decide the mode of preserving the documents, whether in physical form or in electronic form.
- iv) To decide the procedure to destroy the documents after eight years or other applicable period.
- v) To help employees understanding their obligations in retaining and preserving the documents and records.

#### **4. DEFINITION:**

“**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

“**Board**” means the Board of directors of the company or its committee

“**Company**” means Sobhagya Mercantile Limited

“**Document**” 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 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 or destroyed.

**“Financial Year”** shall have the same meaning as assigned to it under sub-section (41) of section 2 of the Companies Act, 2013;

Unless the context otherwise requires, words and expressions used in this policy and not defined herein but defined in the Companies Act, 2013 and Listing Regulations as may be amended from time to time shall have the meaning respectively assigned to them therein.

## **5. PRESERVATION OF DOCUMENTS:**

The company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the listing regulations and any other law, rules, regulations as applicable to the company from time to time.

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

- a. Documents whose preservation shall be permanent in nature;
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions.

The documents shall be preserved in the manner as stated below:

<b>Type of documents</b>	<b>Period of preservation</b>
Documents evidencing registration/incorporation of the Company/change of name etc. and Constitution documents such as Memorandum and Articles of Association.	Permanently
Statutory Registers, Minutes book (Board meetings or committee meetings, General meetings)	Permanently
Books of Accounts and Annual Return prepared under the Companies Act, 1956/2013.	For Eight financial year preceding current financial year
Notices and Agenda of the Board Meeting/Annual General	For eight financial

Meeting/Extra Ordinary General Meeting and Attendance Registers of Board/committee meetings, declarations from Directors etc.	years
Court Orders relating to amalgamations/mergers/de-mergers etc. and approval of Central/State Governments	Permanently
Various filings made with Registrar of Companies, stock exchange, Reserve Bank of India or any other statutory authority(ies)	For eight years after the filing of the same with the respective authority(ies)
Various policies adopted by the Board of Directors.	Permanently
Contracts entered into by the Company from time to time	For eight years after the expiry of the term of the contract
Documents relating to legal cases and litigation relating to the Company.	For eight years after completion of legal proceedings.
Taxation Documents including documents concerning tax assessment, tax filings, tax returns, proof of deductions, Challans, appeals preferred against any claim made by the relevant tax authorities.	For eight years or till completion of assessment whichever is later.
Documents relating to any property owned by the Company.	Permanently
Licenses obtained by the Company	Eight years from the date of expiry/termination of the License.
Intellectual property Rights documents shall include, but not be limited to copyrights, trademarks, patents, and industrial designs. Intellectual property rights documents that are owned by the Company.	Permanently
Any other statutory documents not covered above.	For eight financial years.

## 6. MODES OF PRESERVATION:

Records/ Documents may be preserved either physically or in electronic form.

## 7. DESTRUCTION OF RECORDS:

The records/documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal.

## **8. 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.

## **9. 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.