

POLICY FOR PRESERVATION OF DOCUMENTS

{PURSUANT TO SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS)
REGULATIONS, 2015}

• **PREAMBLE**

The Securities and Exchange Board of India (SEBI) has notified Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Regulations") on 2nd September, 2015 which will be effective from 1st December, 2015.

The Board of Directors ("Board") of "SRINIBAS PRADHAN CONSTRUCTIONS LIMITED" ("Company") has approved the following policy ("The Policy") of the Company for preservation of Documents/records maintained by the Company either in physical mode or electronic mode (hereinafter referred to as ("Documents")). This Policy has been framed in accordance with the requirements of Regulation 9 of the said Listing Regulations.

• **OBJECTIVE**

The purpose of this policy is to ensure that all necessary documents of the Company are adequately protected and maintained/preserved as per the statutory and regulatory requirements. Further, documents of the Company which are no longer needed may be destroyed after following due process in this regard. This policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

The main objectives of the policy are:

- ❖ Identification of Statutory Registers and other records of the company which are required to be preserved.
- ❖ Identification and Categorization of Statutory Registers and other documents to be maintained either for eight years or permanently.
- ❖ Decide whether the statutory records and documents are to be preserved in physical form or electronic form.

• **DEFINITIONS**

Unless the context otherwise requires, the words, terms, expressions and derivations used in the policy shall have the meaning given in the Listing Regulations,

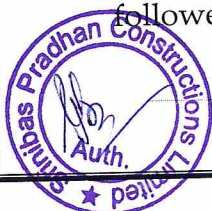


Companies Act, 2013 or any other Act(s), Rules and Regulations mentioned in this policy:

- a) **"Board of Directors"** or **"Board"** mean the Board of Directors of SRINIBAS PRADHAN CONSTRUCTIONS LIMITED (Including duly authorized Committee thereof), as constituted from time to time;
- b) **"Company"** means SRINIBAS PRADHAN CONSTRUCTIONS LIMITED;
- c) **"Companies Act"** means Companies Act, 2013 and the rules made there under;
- d) **"Document"** includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- e) **"Financial Year"** shall have the same meaning described under the Act;
- f) **"Electronic Form"** with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device;
- g) **"Key Managerial Personnel"** or **"KMP"** shall have the same meaning ascribed to it under the Act;
- h) **"Policy"** means Policy on Preservation of Documents of the Company;
- i) **"SEBI Regulations"** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time;

• POLICY FOR PRESERVATION OF DOCUMENTS

- I. Documents and records of the Company required to be maintained under the SEBI Regulations shall be classified in two categories as below:
 - a) Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;
 - b) Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions, subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.
- II. The Listing documents and records in physical form shall be in the custody of the Company Secretary.
- III. The Company may keep the Listing documents and records as specified above in electronic mode.
- IV. The Register and share transfer Agent shall ensure that the correct procedures are followed for maintenance of the Listing records required to be maintained by them.



- **REGISTER OF DOCUMENTS DESTROYED**

Respective Heads of Department responsible for preservation of related documents may destroy such documents, which are no longer required as per this policy.

- **COMMUNICATION OF THIS POLICY**

For all new employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other policies. For all existing Employees and Directors, a copy of this policy shall be handed over within one month of the adoption of this policy by the Board of Directors of the Company.

- **AMENDMENT**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/ or amend any part of this policy or the entire policy, at any time, as it deems fit, or from time to time, and the decision of the board in this respect shall be final and binding.

Ramakrishna Pradhan



Annexure A

A) PERMANENT PRESERVATIONS

- a) Common Seal
- b) Minute book of Board/ General/Committee Meetings
- c) Statutory Registers
- d) License and Permissions
- e) Statutory Forms and Disclosures except for routine Compliance
- f) Register of Members
- g) Index of members
- h) Scrutinizers Report

B) TEMPORARY PRESERVATIONS UPTO 8 YEARS

- a) Annual Returns
- b) Board Agenda and Supporting Documents
- c) Attendance Register
- d) Books of Accounts, Financial statements etc.
- e) Register of debenture holders or any other Security Holder
- f) All notices pertaining to disclosure interest of directors
- g) Office copies of Notice of General Meeting and related papers.

Srinibas Pradhan Constructions Limited
Kanakaila Pradhan
Whole Time Director