

# The Swastik Safe Deposit & Investments Limited

## Policy on Preservation of Documents

### 1. Background

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Regulations') requires listed companies to formulate a policy on Preservation of Documents which has to be approved by the Board of Directors.

In this context, the following policy has been framed by the Board of Directors ('Board') of The Swastik Safe Deposit & Investments Limited ('the Company') with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation. The policy came into effect from 1<sup>st</sup> December, 2015.

This policy be modified / amended with the approval of the Board of Directors only.

### 2. Objective of the Policy

The objective of this Policy is to classify the documents, records and registers of the Company which are required:

- (i) To be preserved permanently; and
- (ii) To be preserved for a period of not less than 8 years.

### 3. 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 may be applicable to the Company from time-to-time.

For determining the preservation period, the records are categorized into following three categories:

Category & Description	Period of Preservation
Records/documents with short reference value – i.e. Records, which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc.	Less than 8 years
Records/documents required to be maintained as per statutory requirements and having higher reference value – i.e. records having contractual/legal implications, which need to be preserved	Documents to be preserved for a period of 8 to 12 years

for a prescribed periods per statutory requirement; and records, which need to be, preserved for a particular period according to Company's own reference needs.	
Records which will have a permanent value for the Company even after the expiry of legal preservation period.	Permanent
Records which are required for adducing evidence in judicial or quasi-judicial or other dispute redressal forum	Till the time the matters are finally disposed of.

Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi-judicial for and other mediation and alternate dispute fora, industrial disputes, etc. are preserved according to specific needs and even beyond the prescribed period.

Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government/ Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

#### **4. Mode of Maintenance**

The Company shall maintain these records either in physical or electronics mode. The applicable provisions of law, rules and regulation with regard to electronic maintenance of records shall be adhered to.

All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulation.

#### **5. Disposal And Destruction Of Records**

After the expiry of the statutory retention period, the preserved documents may be destroyed, destruction of documents as an administrative practice shall be followed for the records which are duplicate /unimportant /irrelevant.

This applies to both physical and Electronics Documents. The Documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shared or otherwise render unreliable confidential paper records; or
- c. Delete or destroy electronically stored data.

\*\*\*\*\*