

**SAGAR SOYA PRODUCTS LIMITED**  
**I.POLICY FOR PRESERVATION OF DOCUMENTS**

**[Framed under Regulation 9 of Chapter III of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]**

**1. Definitions:**

In this Policy, unless the context otherwise requires:

“Company” means Sagar Soya Products Limited.

“Regulations” means Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Words and expressions used in this Policy but not defined shall have the meaning as given in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Any subsequent modification and/or amendments brought about by SEBI in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 shall automatically apply to this Policy.

**2. Purpose and Scope:**

The purpose of this document is to present a high level policy statement for Sagar Soya Products Limited (“the Company”) regarding preservation of its documents in accordance with all the statutory and regulatory provisions applicable to the Company including the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

This policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, and how and when those documents should be disposed off, if no longer needed pursuant to the applicable statutory and regulatory provisions.

**3. Classification of Documents to be preserved / retained:**

The Board of Directors has classified the documents to be retained and preserved in two categories which are mentioned below:

- 1) Documents whose preservation shall be permanent in nature - as prescribed under Companies Act, 2013 & Rules made there under.
- 2) Documents with preservation period of not less than 8 years after completion of relevant transactions- as prescribed under Companies Act, 2013 & Rules made there under.

Income Tax, Sales Tax, Central Excise and Service Tax related documents, i.e., Assessment Orders, Tax Bills, Receipts, Statements, Returns, Notices, etc. shall be preserved for a period of 8 years as required under the applicable laws.

Details pertaining to the list of documents to be preserved under the abovementioned applicable laws and regulations have been provided to the respective departments to ensure safe record keeping and compliance of the applicable laws and regulations.

#### **4. Periodical Review of the Policy by the Board of Directors:**

This policy shall be reviewed periodically by the Board and amendments effected subject to approval of the Board if and when practical difficulties are encountered. The Board may also review this policy on document retention to comply with any local, state, and central legislation that may be promulgated from time to time.

#### **5. Suspension of Record Disposal in the event of Litigation or Claims:**

In case the Company is served with any notice for request of documents or a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, then disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. Such documents shall be preserved until the completion of the judicial proceedings.

#### **6. Register of Documents destroyed:**

The company shall maintain a register in the form set out in the *Annexure* enclosed hereto wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Company Secretary or such other persons as may be authorized by the Board for the purpose.

#### **7. Policy Review:**

This Policy is framed based on the requirements of Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

In case of any subsequent changes in the Companies Act, 2013 or Regulations which makes any of the provisions in the Policy inconsistent with the Regulations, the provisions of the Act or Regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

This Policy shall be reviewed by the Board of Directors as and when any changes are to be incorporated in the Policy due to change in regulations or as may be felt appropriate by the Board. Any changes or modification on the Policy would be approved by the Board of Directors.

#### **8. Policy Severable:**

This Policy along with Annexure constitutes the entire document in relation to its subject matter. In the event that any term, condition or provision of this Policy is being held to be in violation of any applicable law, statute or regulation, the same shall be severable from the rest of this Policy and shall be of no force and effect, and this Policy shall remain in full force and effect as if such term, condition or provision had not originally been contained in this Policy.

**Annexure**

**REGISTER AS PER COMPANIES ACT, 2013**

<b>Sr.No</b>	<b>Record Type</b>	<b>Preservation period</b>
1	Memorandum and Articles of Association	Permanent
2	Certificate of Incorporation	Permanent
3	Minutes of Board and Committee Meetings	Permanent
4	Minutes of Shareholders' Meetings	Permanent
5	Register and Index of Members	Permanent
6	Resolutions passed by circulation	8 Financial Years
7	Listing Agreement executed with the stock exchanges	Permanent
8	Attendance Register - Board and Committee Meetings	8 Financial Years
9	Register of investments in securities not held in the name of the Company	Permanent
10	Register of renewed and duplicate certificates	Permanent
11	Register of contracts in which Directors are interested	Permanent
12	Register of Directors, Managing Director, Manager and Secretary	Permanent
13	Register of Directors' Shareholding	Permanent
14	Register of Inter-corporate loans and investments	Permanent
15	Register of transfer of shares	Permanent
16	Register of Transmission of shares	Permanent
17	Forms filed with Registrar of Companies (ROC)	Permanent
18	Notice and Agenda of the Board and Committee Meetings	8 Financial Years
19	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
20	Annual Returns	8 Financial Years
21	Correspondence with shareholders	8 Financial Years
22	Disclosures under SEBI - Substantial acquisition of shares and Takeovers, Regulations	8 Financial Years
23	Disclosures under SEBI - Prohibition of Insider	8 Financial Years

	Trading Regulations	
24	Postal Ballot forms	8 Financial Years
25	Scrutinizer's Reports on voting at General Meetings/ Postal Ballot	8 Financial Years
26	Newspaper cuttings of notices of Board Meeting and Financial Results	8 Financial Years
27	Investor meet presentations	8 Financial Years

### ACCOUNTS AND FINANCE RECORDS

<b>Sr No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
1.	Annual Audited and Financial Statements	Permanent
2.	Books of Accounts, Ledgers & Vouchers	8 Financial Years
3.	Investment Records	8 Financial Years from the date of redemption
4.	Engagement letters from Auditors	8 Financial Years

### TAX RECORDS

<b>Sr No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
1	Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return	8 Financial Years
2	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax	8 Financial Years