

PRESERVATION OF DOCUMENTS

1. INTRODUCTION

In pursuance of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 of the ("Listing Regulations"), Sujala Trading & Holdings Limited, ("the Company") is required to formulate a policy for preservation of documents in accordance with requirement of Regulation 9 of SEBI (LODR) Regulations, 2015. Accordingly, the Company at its meeting held on November 13, 2015 approved and adopted this "Policy for preservation of documents" which shall be effective from December 1, 2015.

2. OBJECTIVE

This policy aims to ensure that the official documents of the Company Maintained in physical and/or electronic form shall be preserved for a minimum period of 8 years from the date of completion of relevant transaction.

Provided that, if any other applicable law requires the preservation of documents for a longer period or permanently, then those documents shall be preserved / maintained accordingly.

3. MODES OF PRESERVATION

The Managing Director shall appoint Authorized Person(s) responsible for preservation and custody of documents in physical and/or electronic form as per the requirement of applicable law to ensure that there is no tampering, alteration, destruction or anything which endangers the contents, authenticity, utility or accessibility of the documents.

4. INDICATIVE LIST OF DOCUMENTS

A. DOCUMENTS TO BE PRESERVED PERMANENTLY

- 1) The Memorandum And Articles of Association
- 2) Minute Book of General Meetings of the members
- 3) Minutes Book of meetings of Board of Directors
- 4) Minute Book of meetings of Committees of the Board
- 5) Register of Members along with index
- 6) Register of Directors and Key Managerial Personnel

B. DOCUMENTS TO BE PRESERVED FOR A PERIOD OF 8 YEARS AFTER COMPLETION OF RELEVANT TRANSACTION/PERIOD

- 1) Books of Accounts together with relevant vouchers
- 2) Attendance Register for the Meetings of the Board and its Committees
- 3) Attendance Register of General Meetings
- 4) Office copies of Notices, Agenda, Notes on Agenda and other related papers of Board and its Committee Meetings
- 5) Office copies of Notices, scrutiniser's reports and related papers of General Meetings
- 6) Annual Returns prepared under section 92 of the Companies Act, 2013 and copies of all certificates and documents annexed thereto
- 7) Disclosure of interest by Directors
- 8) Shareholding Pattern filed with the Stock Exchanges
- 9) Corporate Governance Report submitted to the Stock Exchanges
- 10) Reconciliation of Share Capital Audit Report submitted to the Stock Exchanges
- 11) Any other documents submitted or disclosures made to the Stock Exchanges
- 12) Documents filed with Registrar of Companies or Ministry of Corporate Affairs (other than the documents which are required to be maintained permanently)

The documents mentioned above may be destroyed after expiry of the period mentioned against the respective documents after obtaining the approval of the Managing Director;

Provided that if it is prescribed under any law, regulation or Secretarial Standard on Meetings of the Board of Directors or Secretarial Standard on General Meetings that a particular document shall be destroyed only after taking approval of the Board of Directors.

C. OTHER DOCUMENTS

In case of documents not included in indicative list mentioned in (A) & (B) above, the same will be preserved as per the requirements of applicable Acts, Rules, Regulations of Reserve Bank of India, Securities and Exchange Board of India, Income Tax Department, Ministry of Corporate Affairs, Stock Exchanges and other statutory and regulatory authorities.

5. PLACE OF PRESERVATION & MAINTENANCE

The documents shall be preserved / maintained at the Registered Office/ Corporate Office/Registrar and Share Transfer Agent/ Branch Office or such other places as per the requirement of applicable law as may be decided by the Authorized Person(s).

6. AMENDMENT

The Policy can be amended, modified or revised by the Board of Directors of the Company from time to time. In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed there under and Listing Regulations ("Statutory Provisions"), the provisions of Statutory Provisions shall prevail.