

SAPTARISHI AGRO INDUSTRIES LIMITED

POLICY FOR PRESERVATION OF DOCUMENT

1. PREFACE:

The Board of Directors (the “Board”) of Saptarishi Agro Industries Limited (the “Company”) has adopted the following policy with regard to preservation of documents. This Policy has been formulated in accordance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (“the Listing Regulations”). This Policy shall be known as “Policy for Maintenance and Preservation of Documents”.

2. OBJECTIVE OF THE POLICY AND SCOPE

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately preserved, protected and if required, destroyed as per the statutory requirements after following the due process. 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.

For the purpose of these instructions, Document shall include all information in whatever form it may be stored e.g. hard copies, electronic documents, computer disc, mails, etc.

All the Words and expressions used in this Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the SEBI’s LODR, 2015 and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars made/issued thereunder, as amended from time to time.

3. ADMINISTRATION

The Documents of the Company shall be classified into following categories based on period of preservation

- 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;
- specified in clauses (a) and (b) above may be kept in electronic mode.

Schedule A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The list of Documents is indicative list and shall not be construed to be exclusive. Company Secretary cum Compliance Officer of the Company (“CS”) shall be incharge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator under the supervision / guidance of the Board of Directors is also authorized to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy. Notwithstanding anything contained in this policy, if any document is required to be maintained and preserved under any Act or law for the time being in force, then such document shall be maintained and preserved as per the provisions of the particular Act or law.

4. PROCEDURE FOR DISPOSAL OF DOCUMENTS

The Documents of the Company which are no longer useful may be destroyed as per timeline prescribed in Schedule A with the permission of Administrator and after following the due process as mentioned herein. The Administrator will confirm from respective departmental head about the destruction of the records which are no longer required as per the Documents Preservation Schedule given under Schedule A. Once the Departmental head confirms for destruction of the document, the administrator shall confirm the same from a Committee comprising of Chief Financial officer and Business Unit Heads.

5. POLICY REVIEW AND BOARD'S APPROVAL

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications.

ANNEXURE 1 **DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE**

Sr No.	Documents Type	Preservation Period
1.	Common Seal, Certificate of Incorporation, Memorandum and Article of Association as amended from time to time, Share Certificate	
2.	Minutes Books of Board, General Meetings and Committees Meetings	
3.	Statutory Registers	
	Register of Members along with Index of Members (if any)	
	Register of Inter Corporate Loans and Investments	
	Register of Directors, Key Managerial Personnel and their holding	
	Register of contracts or arrangements with related parties and contracts and bodies, etc. in which directors are interested	
	Register of Loan, Guarantee, Security and Acquisition	
	Register of Investments (for Investments of Company held or not held in its own name)	
	Register of Proxies	
	Attendance Registers	
	Register of Renewed and Duplicate Share Certificates issued	
	Register of Charges	
	Register of Employee Stock Options, if any	
	Register of Sweat Equity Shares, if any	
	Register of Buy Back of Securities, if any	
	Foreign Register of Members, if any	

ANNEXURE 2

**DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN 8 (EIGHT) YEARS AFTER COMPLETION
OF THE RELEVANT TRANSACTIONS**

Sr No.	Documents Type	Preservation Period
1.	Annual Returns prepared under the Companies Act, 2013 and copies of all certificates and documents required to be annexure thereto (as per Companies Act, 2013 and Rules framed thereunder)	8 Years
2.	Copies of Notices, Agenda, Notes on Agenda, Attendance Registers and other related papers of General Meetings, Board Meetings and various Committee Meetings	8 Years
3.	Books of Account together with vouchers relevant to any entry in such books of account	8 Years
4	Instrument creating a charge or modification thereof (as per Companies Act, 2013 and Rules framed thereunder)	8 Years
5	Register of Debenture-holders (if require)	15 years after the redemption of debentures
6	Index of debenture-holders (if require)	15 years after the redemption of debentures
7	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.	As per requirement

ANNEXURE - 3

RECORDS TO BE MAINTAINED IN SECRETARIAL DEPT.

Sr. No.	Section/ Rules	Description of document	Time upto which document to preserved	Place of Document	Remarks
1	128(5)	Books of Accounts including vouchers relevant to any entry in such books of account	8 financial years preceding current FY.	Registered office of the company or at such other place in India	If, an investigation has been ordered in respect of the company under Chapter XIV, the Central Government may direct that the books of account may be kept for such longer period as it may deem fit.
2	the Companies (Meetings of Board and its Powers) Rules, 2014.	Disclosures/ Notices by a director of his interest	For a period of 8 years from the end of the financial year to which it relates	Registered office of the company and shall be kept in the custody of the company secretary of the company or any other person authorized by the Board for the purpose	Format of disclosure as per Form MBP 1
3	Section 186(9) & rule 12(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of loans, guarantee, security and acquisition made by the company	permanently	-----"	Format of register as per Form MBP 2
4	section 187(3) and rule 14(1) of the Companies (Meetings of Board and its Powers) Rules, 2014.	Register of investments not held in its own name by the company	permanently	-----"	Format of register as per Form MBP 3.

5	section 189(1) and rule 16(1) of the Companies (Meetings of Board and its Powers) Rules, 2014.	Register of contracts with related party and contracts and Bodies etc. in which directors are interested	permanently	-----	Format of register as per Form MBP 4.
6	Section 73 & the Companies (Acceptance of Deposits) Rules, 2014	Registers of deposits	for a period of not less than 8 years from the financial year in which the latest entry is made in the register	registered office	--
7	Section 85 & the Companies (Registration of Charges) Rules, 2014	Register of charges	The register of charges shall be preserved permanently	registered office	Format of register as per Form No. CHG.7.
8	Section 85 & the Companies (Registration of Charges) Rules, 2014	The instrument creating a charge or modification	preserved for a period of 8 years from the date of satisfaction of charge by the company	registered office	--
9	Section 88 & the Companies (Management and Administration) Rules, 2014.	Register of Members including an index of the names	permanently and shall be kept in the custody of the company secretary of the company or any other person authorized by the Board for such purpose;	registered office or be kept at any other place in India in which more than one-tenth of the total number of members entered in the register of members reside, if approved by a special resolution passed at a general meeting of the company and the Registrar has been given a copy of	Format of register as per Form No. MGT.1.

				the proposed special resolution in advance	
10	Section 88 & the Companies (Management and Administration) Rules, 2014.	Register of debenture-holders including an index of the names	preserved for a period of 8 years from the date of redemption of debentures or securities, as the case may be.	-----"	Format of register as per Form No. MGT.2.
11	Section 88 & the Companies (Management and Administration) Rules, 2014.	Foreign Register of Members	preserved permanently, unless it is discontinued and all the entries are transferred to any other foreign register or to the principal register	-----"	Format of register as per Form No. MGT.1.
12	Section 88 & the Companies (Management and Administration) Rules, 2014.	foreign register of debenture-holder	preserved for a period of 8 years from the date of redemption of such debentures	-----"	Format of register as per Form No. MGT.2.
13	Section 88 & the Companies (Management and Administration) Rules, 2014.	Annual return and copies of all certificates and documents required to be	preserved for a period of eight years from the date of filing with the Registrar	-----"	Format of register as per Form No. MGT.7.

		annexed thereto			
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14	Rule 25 of the Companies (Management and Administration) Rules, 2014.	Minutes of General	Preserved permanently and kept in the custody of the company secretary or any director duly authorised by the board or at such other place as may be approved by the Board	Registered Office	--
15	Rule 25 of the Companies (Management and Administration) Rules, 2014.	Minutes of Board or Committee Meetings	----“---	registered office or such place as Board may decide	--
16	Rule 18 of the Companies (Share Capital and Debentures) Rules, 2014.	Debenture trust deed	--	--	--
17	Rule 6(3) of the Companies (Share Capital and Debentures) Rules, 2014	Register of Renewed and Duplicate Share Certificates	preserved permanently and shall be kept in the custody of the company secretary of the company or any other person authorized by the Board for the purpose	registered office of the company or at such other place where the Register of Members is kept	Format of register as per Form No. SH 2.
18	Rule 7 of the Companies (Share Capital and Debentures) Rules, 2014.	all books and documents relating to the issue of share certificates, including the blank forms of share certificates	not less than 30 years and in case of disputed cases, shall be preserved permanently	Not specified	kept in the custody of the secretary or such other person as the Board may authorise for the purpose; and the company secretary or other person aforesaid shall be responsible for rendering an account of

					these forms to the Board
19	Rule 7(3) of the Companies (Share Capital and Debentures) Rules, 2014.	all certificates surrendered to a company shall immediately be defaced by stamping or printing the word "cancelled" in bold letters	may be destroyed after the expiry of three years from the date on which they are surrendered, under the authority of a resolution of the Board and in the presence of a person duly appointed by the Board in this behalf	Not specified	--
20	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	All the forms, intimations, compliances, reports filled under regulations, 2015	For a period not less than 8 years from the end of the financial year to which it relates	Not specified	--

21	Other not covered in above	All the forms, intimations, compliances, reports filled under MCA/SEBI/Stock Exchange/Other Statutory Authority	For a period not less than 8 years from the end of the financial year to which it relates	Not specified	--
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