



SAGAR PRODUCTIONS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

▣ LEGAL FRAMEWORK

As per Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), every listed entity is required to frame a policy for preservation of documents to ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory.

▣ SCOPE

The Policy shall be applicable on preservation of documents / records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “Documents”). This policy aims to provide guidance on various aspects of preservation of the Documents, and to safely dispose of the Documents.

The Board of Directors (hereinafter referred to as “Board”) had in its Meeting dated 12th February 2016 approved the policy. This Policy will be applicable to the Company effective **1st December, 2015**.

▣ DEFINITION

In this policy unless the context otherwise requires

- a. “**Act**” means the Companies Act, 2013 and rules made there under, as amended from time to time
- b. “**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
- c. “**Company**” means Sagar Productions Limited
- 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. “**Key Managerial Personnel**” or “**KMP**” shall have the same meaning ascribed to it under the Act.
- f. “**Board**” or “**Board of Directors**” shall mean the Board of Directors of Sagar Productions Limited, as may be re-constituted from time to time
- g. “**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.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

▣ OBJECTIVES

To determine preservation period for records/documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Identification of statutory records under respective statutes to be preserved
- Providing binding framework for preservation of documents
- Litigation requirements
- To ensure easy retrieval
- To ensure that unwanted records do not occupy storage space
- Avoiding superfluous inventory of documents

▣ RESPONSIBILITY

The concerned departmental head will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

▣ PRESERVATION PERIOD

The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made; the preservation period of agreements starts with the end of the financial year in which the agreement period expires.

The preservation of Documents shall be done in the following manner:

- a) Documents to be preserved or retained permanently. An indicative list of the Documents to be preserved in this category is provided in Annexure.
- b) Documents required to be preserved for a period of not less than 8 (Eight) years from the date of completion of relevant transactions. An indicative list of the Documents to be preserved in this category is provided in Annexure.

▣ PRESERVATION LOCATION

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute may be maintained at the corporate office of the Company or with the concerned department or at any other place as may be, decided by the officers of the Company considering their utilization and usefulness.

▣ MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

While preserving the documents, the Authorized Officers have to ensure that the documents are retained in good state. There shall not be any tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

❏ CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED

The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space. This will be done after obtaining prior approval of the Board.

❏ DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head (s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

❏ POLICY REVIEW

This Policy shall be reviewed on a periodic basis and the Managing Director and Company Secretary are authorized to make such changes as may be deemed necessary or as warranted by law.

❏ DISCLAIMER

In any circumstance, where the terms of this policy differ from any existing or newly enacted laws, rules, regulations or standards governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

Annexure

Documents to be preserved permanently		Documents to be preserved for a period of 8 years from the date of its event	
1	Common Seal	1	Books of accounts of the Company
2	Certificate of Incorporation, Certificate of Incorporation upon change of Name, Certificate issued on registration of special resolution issued upon alteration of main object	2	Register of debentureholders including Index of the names, if any
3	Certificate of Commencement of business	3	Annual Returns filed with MCA alongwith copies of all certificates and documents required to be annexed thereto
4	Memorandum and Articles of the Company	4	Forms and returns filed with RBI/ MCA or with any other statutory authority
5	License and Permissions	5	All notices pertaining to Disclosures by Directors of his interest
6	Agreements made by the Company with Stock Exchanges, Depositories, etc.	6	Register of Deposits
7	Listing / Trading approvals received from Stock Exchanges	7	Annual financial statements including Annual accounts, Directors report, Auditors report, Corporate Governance Report, etc.
8	Offer documents for Public Issues and Private Placement of securities filed with Securities Exchange Board of India.	8	Income Tax Returns filed under Income Tax Act, 1961
9	Minute Books of General Meetings, Board and Committee Meetings including meeting conducted through Postal Ballots	9	Instrument creating charge or modification from the date of satisfaction of charge
10	Register of Members including Index of such Members	10	Notice & Agenda of all Board, Committee Meetings including Notice of Postal Ballot
11	Foreign Register of Members maintained at any point of time	11	Correspondences made with any statutory authority
12	Register and index of beneficial owners maintained by a Depository	12	Attendance Register
13	Register of Renewed and Duplicate Share Certificate	13	Scrutinizer's Report on Postal ballot and AGM
14	Register of loans, guarantee, security and acquisition made by the Company	14	All Reports, Disclosures and intimations filed under - SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 - SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - SEBI (Prohibition of Insider Trading) Regulations, 2015
15	Register of Investment made by a Company not held in its own name		
16	Register of Contract or Arrangements in which Directors are interested		
17	Register of charges		
18	Books and Documents relating to the issue of share certificates, including the blank forms of share certificates		
19	Orders issued by Courts/Statutory bodies	15	Copies of Newspaper Advertisements/ Press Releases/Publicity materials, etc.

20	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register	16	Copies of contracts till and beyond the life of agreement
21	Register of records and documents destroyed	17	Insurance Policies/ Premium Receipts
22	Register of Directors & KMPs	18	Any other documents as required under any acts, laws, regulations, etc.
23	Any other documents as required under any acts, laws, regulations, etc.		

Approved by the Board in its Meeting No. 04/2015-16 held on 12th February 2016.

Duly Authenticated by

(Mr. Kalakad Sathi)

Chairman & Whole-time Director