

# **S. P. APPARELS LIMITED**

**POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL**

**Amended dated 10.02.2025**

**POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL**

## **PREAMBLE**

This Policy for Preservation of Documents and Archival (hereinafter referred to as 'this / the Policy') is framed in accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) (hereinafter referred to as "Listing Regulations" or "the Regulations") read with relevant SEBI circulars/notifications.

In terms of Regulation 9 of the Listing Regulations, the company is required to formulate a policy for preservation of documents.

In terms of Regulation 30(8) of the Listing Regulations, the company shall be required to formulate a policy on archival of all the disclosure of events/ information made to the Stock Exchanges and disclosed on the website of the company in accordance with Regulation 30 of the Listing Regulations.

## **SCOPE**

This policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed.

This policy shall also govern the disclosure and archival of such contents only which have been disclosed on the website of the company pursuant to the compliance with Regulation 30 of the Listing Regulations and to the Stock Exchanges. Other contents displayed/ hosted on the website shall be out of the purview of the policy and can be archived / deleted as per the discretion of the company.

## **OBJECTIVES**

The main objectives of this policy are as follows:

- To set standards for classifying, managing and preservation of documents of the Company
- To ensure that all the documents, disclosures made to the Stock Exchanges pursuant to the Regulations are hosted on the website and then transferred to the archives folder of the website of the company after the completion of 5 years from the date of disclosure of the event.

## **DEFINITIONS**

All the words and expressions used in this Policy shall have the meaning respectively assigned to them under the provisions of the Listing Regulations and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Circulars, Notifications made / issued thereunder, as amended from time to time.

## **PRESERVATION OF DOCUMENTS**

The documents maintained by the Company shall be classified for the purpose of preservation into two categories namely

- Documents whose preservation shall be permanent in nature
- Documents with preservation period of not less than eight years after completion of the relevant transactions

### **Documents whose preservation shall be permanent in nature**

The documents of a permanent nature as specified in Annexure 1 shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

Documents with preservation period of not less than eight years after completion of the relevant transactions

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions as specified in Annexure 2 shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

### **Mode of Preservation**

The Documents as classified above may be preserved either in physical or in electronic mode.

### **Roles and Responsibilities**

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destruction of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

### **Destruction of Documents**

Destruction of documents after the said period of 8 years (whose preservation shall not be permanent in nature) shall be done in the presence of an Authorized person in the method as prescribed by the applicable statutes.

Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

The details of the documents destroyed by the Company shall be recorded in the 'Register for Disposal of Records' to be kept by Employees who are disposing off the documents in the format prescribed at Annexure 3. The entries in the register shall be authenticated by the Authorised Person.

## **ARCHIVAL OF DOCUMENTS AND DISCLOSURES**

The documents, information, disclosures, notices, policies as provided under the Regulations and the Act, which is required to be disclosed on the website, shall be uploaded on the website of the company. The website of the company shall be reviewed on regular intervals for ensuring that all the above mentioned disclosures are available on the website as required.

The disclosures made under Regulation 30 of the Listing Regulations shall be hosted on the website of the company for a period of 5 years and thereafter shall be moved to the Archived folder as required by law.

However, the audio and video recordings of post earnings or quarterly calls disclosed under the Listing Regulations shall be hosted on the website of the company for such period specified under the Listing Regulations and thereafter shall be moved to the Archived folder as required by law.

The documents in the archive folder of the company shall be preserved for such time at the discretion of the company and the same shall be removed / deleted thereafter.

## **POLICY REVIEW AND APPROVAL**

The Policy shall be subject to review as may be deemed necessary to comply with any regulatory amendments or statutory modifications or subject to necessary approval of the Board of Directors.

### **Documents whose preservation shall be permanent in nature      Annexure I**

<b>S. No.</b>	<b>Documents</b>
1.	Registration Certificates
2.	Statutory Registers as required under applicable laws
3.	Audited Financial Statements

4.	Minutes of General Meetings
5.	Minutes of the meetings of the Board of Directors
6.	Minutes of various Committee Meetings
7.	Agenda of Board Meetings and other related documents
8.	Attendance Register of Board Meetings and Committee Meetings
9.	Licenses and other statutory approvals
10.	Material Agreements / Contracts
11.	Orders issued by the Court/ Statutory Bodies
12.	Property Documents and other related records
13.	Investment Documents / Proofs including certificates, etc.
14.	Any other document as may be required to be maintained permanently in terms of applicable law(s) and preserved from time to time.

## ANNEXURE 2

**Documents with preservation period of not less than eight years after completion of the relevant transactions**

<b>S. No</b>	<b>Documents</b>
1.	Books of Accounts
2.	Annual Returns
3.	Personnel Documents
4.	Insurance Policies/ Claims under various policies
5.	Correspondences with Shareholders/ Departments
6.	Non-statutory Registers/ Documents
7.	Any other document as may be required to be maintained in terms of applicable law(s) and preserved from time to time.

## ANNEXURE 3

**Specimen format of the 'Register for Disposal of Records'**

<b>Particulars of document along with provision of law</b>	<b>Date and mode of destruction</b>	<b>Initials of the authorised person</b>