

S R INDUSTRIES LIMITED

Policy on Preservation of Documents
[Pursuant to Reg. 9 of the SEBI
(Listing Obligations and Disclosure Requirements)
Regulations, 2015]

Policy on Preservation of Documents

Preamble:

Pursuant to the Regulation 9 of the Securities and Exchange Board of India's (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulation), mandates that all listed companies establish a policy for preserving records. As a valuable asset, our Company's corporate records require effective management and access. This Policy outlines our approach to creating, maintaining, preserving, and disposing of records, categorizing them into permanent and temporary records. It also defines responsibilities for record-keeping and ensures the preservation of records in our Company Archives.

Definitions:

“Archive” is an accumulation of historical records or the physical place/electronic mode where they are located. Archives contain primary source documents that have accumulated over the course of an organization's lifetime, and are kept to show the function of that organization.

“Board” means the Board of Directors of S R Industries Limited.

“Company” means S R Industries Limited inclusive of its Registered Office and all Branch Offices.

“Chief Executive Officer” or “Managing Director” or “Manager” shall mean the person so appointed in terms of the Companies Act, 2013 and Listing Regulation.

“Compliance Officer” means the Company Secretary of the Company or the Officer appointed by the Board of Directors of the Company for the purpose of this Policy and the Regulations under the provisions of the Companies Act, 2013 and Listing Regulation.

“Committee” shall mean committee of the Board of Directors or any other committee so constituted.

“Evidence” means information that tends to prove a fact.

“Financial Year” shall have the same meaning as assigned to it under sub-section (41) of section 2 of the Companies Act, 2013.

“Information systems” means organised collection of hardware, software, supplies, procedures and people which store, process and provide access to information.

“Officer” shall have the same meaning as defined under the Companies Act, 2013 and shall also include promoter of the listed entity.

“Policy” means this Policy on Preservation of records / Archival policy on website disclosure.

"Public" means public as defined under clause (d) of rule 2 of the Securities Contracts (Regulation) Rules, 1957.

“Record” means any recorded information in any format (including, but not limited to paper, audio visual materials, disks, data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs) and kept as evidence of such activity.

“Record appraisal” means the process by which the archives are selected from among the great mass of official records.

“Record keeping systems” means information systems which capture, maintain and provide access to records over time.

“Regulation” means the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, including any statutory modifications or re-enactment thereof.

“Retention Schedule” means the guidance note on the governance of retention and disposition of records on a continuance basis.

"Schedule" means a schedule annexed to the Regulation.

“Specified securities” means ‘equity shares’ and ‘convertible securities’ as defined under clause 29[(eee)] of sub-regulation (1) of regulation 2 of the 30[Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018];.

All other words and expressions used and not defined in this Policy or the Regulation, but defined in the Act or the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and / or the rules and regulations made thereunder, shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case maybe.

Objectives of the Policy:

This Policy provides a comprehensive framework for preserving documents for a specified period, aiming to achieve the following objectives:

a. Effective Corporate Governance and Risk Management: Ensure that all necessary records are maintained to support informed decision-making, accountability, and risk management.

b. Effective Information Management: Provide a structured approach to managing information, enabling efficient access and retrieval of records when needed.

c. Systematic Disposal of Non-Current Records: Ensure the timely and secure disposal of records that have outlived their administrative usefulness.

d. Preservation of Historically Valuable Records: Identify and preserve records of continuing administrative and historical significance, transferring them to the Company's Archives for long-term preservation.

POLICY

Records Appraisal procedure:

The records appraisal process involves a thorough evaluation to determine which records possess sufficient value to warrant long-term preservation. The Company will consider the following guiding principles when deciding whether to preserve documents:

- a. Statutory Requirements:** Whether the records are mandated by regulatory authorities.
- b. Information Availability:** Whether the information contained in the document is readily available from other sources.
- c. Intrinsic Value:** Whether the records possess inherent value beyond their informational content.
- d. User Needs Assessment:** The frequency of use, categorized as:
 - Active Use: Frequently referenced documents.
 - Semi-Active Use: Infrequently referenced documents.
 - Inactive: Rarely or never needed for reference.

These principles serve as a guide for operational and functional departments to make informed decisions about document preservation.

Manner of Preservation of Documents:

To ensure the effective preservation of documents, the Company will employ the following methodologies:

- a. Departmental or Functional Classification: Organizing records by department or function.
- b. Subject or Topic-Based Classification: Organizing records by subject or topic.
- c. Chronological Classification: Organizing records in chronological order.
- d. Customized Classification: Departmental heads may adopt alternative methods that best suit their specific needs.

These methodologies aim to achieve the following objectives:

- a. Compliance with Legal Standards: Ensuring records meet legal requirements for protection, storage, and retrieval.
- b. Optimized Storage and Cost Efficiency: Minimizing storage costs and optimizing space usage.

Storage and Security conditions:

To ensure the integrity and security of preserved documents:

- a. Secure Storage: Records must be stored in secure, clean conditions with minimal risk of damage.
- b. Specialized Storage for Non-Paper Formats: Records in non-paper formats (e.g., digital, audio, or video) require specialized storage conditions and handling procedures.

c. **Higher-Quality Storage for Valuable Records:** Records of continuing value and requiring longer preservation must be stored in higher-quality conditions to ensure their longevity.

Duration of preservation

The Company's Retention Schedule, provided in the Annexure- A & Annexure- B to this Policy, outlines the minimum retention requirements for various categories of Company records. The Retention Schedule categorizes records into the following categories:

- a. Permanent Preservation:** Documents to be preserved permanently.
- b. Active Employment:** Documents to be retained during active employment.
- c. Post-Employment:** Documents to be retained for at least 8 years from the date of termination of employment.
- d. Transaction-Based:** Documents to be retained for at least 8 years after completion of relevant transactions.
- e. Complaint Resolution:** Documents to be retained for at least 8 years from the date the complaint is resolved.
- f. Regulatory Filings:** Documents to be retained for at least 8 years from the date of filing with the Registrar.
- g. Policy/Claim Settlement:** Documents to be retained for at least 8 years from the lapse of the policy or settlement of the claim.
- h. Contract/Agreement:** Documents to be retained for at least 8 years from termination of contract/agreement or completion of purchase.
- i. Financial Records:** Documents to be retained for at least 8 years from the financial year in which the latest entry is made.
- j. Deposit Records:** Documents to be retained for at least 8 calendar years following the financial year in which the latest entry is made.
- k. Other Records:** Documents to be retained for at least 8 financial years following the relevant financial year.
- l. Statutory Records:** Records maintained under various other laws in force from time to time will be accepted.

Accessibility and Confidentiality

To ensure efficient operations and compliance, the Company's records shall be made accessible to authorized personnel and external parties, while maintaining confidentiality and data protection.

Accessibility:

- a. Authorized Personnel:** Records shall be made available to concerned employees of the Company, with the permission of the respective Departmental heads.
- b. External Parties:** Records may be accessed by outside users, such as auditors, regulators, or other authorized third parties, with the permission of the Departmental heads.
- c. Directors and Company Secretary:** The Directors of the Company and the Company Secretary shall have unrestricted access to all records.

Confidentiality:

a. Confidential Records: Records containing sensitive or confidential information shall be restricted and made accessible only with the explicit permission of the Board of Directors or the Company Secretary.

b. Data Protection: The Company shall ensure that all records are handled and stored in accordance with applicable data protection laws and regulations.

By maintaining a balance between accessibility and confidentiality, the Company aims to promote transparency, accountability, and data protection.

Manner of Public Disclosure of records published on the Website of the Company

To ensure transparency and compliance with regulatory requirements, the Company will publish certain documents on its website. The following guidelines outline the manner of public disclosure:

a. Hosting and Duration: Documents required to be published will be hosted under the "Investors Relation" section of the website for the stipulated duration as prescribed by applicable laws or for a longer period as determined by the Directors or the Company Secretary.

b. Archival: After the initial hosting period, documents will be transferred to the "Past Information/Events" section, where they will remain until further instructions from the Directors or the Company Secretary.

c. Updates and Removal: In the event of updates to published records, older versions may be removed from the website at the discretion of the Directors or the Company Secretary, provided such removal does not contravene any applicable laws or regulations.

By following this policy, the Company demonstrates its commitment to transparency, accountability, and regulatory compliance.

Destruction of records Record:

To maintain operational efficiency and ensure compliance with regulatory requirements, the Company will destroy records that no longer serve a useful purpose.

Procedure for Destruction of Records:

a. Approval: Destruction of confidential records requires prior approval from the Directors of the Company or the Company Secretary.

b. Modes of Destruction: The Company will employ the following methods for destroying records:

- Confidential paper records: Made unreadable through shredding or other secure methods.
- Non-confidential paper records: Sold to waste-paper dealers or recycled.
- Electronically stored records: Erased or destroyed with the assistance of the Computer Department.
- Magnetic media records (e.g., floppy disks): Reformatted at least once.
- Optical media records (e.g., rewritable disks): Destroyed by cutting, crushing, or other physical means.

Role and Responsibility of Departmental Heads

- a. Familiarity with Policy: Departmental Heads must be knowledgeable about this Policy and educate their teams accordingly.
- b. Access Restriction: Departmental Heads must limit access to confidential records and information.
- c. Destruction Coordination: Departmental Heads must coordinate with relevant teams to facilitate the destruction of records when required.

Amendments to the Policy:

- a. Review and Revision: The Board will review and amend this Policy as necessary.
- b. Regulatory Updates: Any subsequent amendments or modifications to relevant regulations and laws will automatically apply to this Policy.

Annexure- A
Records to be preserved permanently

Sr. No.	Records
1.	Certificate of incorporation
2.	Certificate for commencement of business
3.	Memorandum and Articles of Association
4.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
5.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
6.	Register and Index of Members, debenture-holders, if any or other security holders, if any
7.	Register of Contracts as per Companies Act, 2013
8.	Register of Charges as per Companies Act, 2013
9.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
10.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
11.	Compliance Reports received from any statutory authority
12.	Correspondences made with any statutory authority
13.	Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
14.	Authorization / licenses obtained from any statutory authority
15.	Policies of the Company framed under various regulations
16.	Register of preservation and disposal of records.
17.	Register of Power of attorneys, if any.
18.	Certificates obtained from various statutory authorities.
19.	Forms and returns filed with any statutory authority

Annexure- B
Records to be preserved for minimum period of Eight Year

Sr. No.	Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013.
2.	Register of Inter Corporate Loans and Investments as per Companies Act, 2013.
3.	Annual Returns as per Companies Act, 2013.
4.	Register of Deposits as per Companies Act, 2013.
5.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013.
6.	Annual financial statements including: - Annual accounts, Directors report, Auditors report.
7.	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013.
8.	Income Tax Returns filed under Income Tax Act, 1961.
9.	All notices in form MBP – 1 received from Directors and KMPs alongwith any amendment thereto.
10.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013.
11.	Copy of newspaper advertisement or publications.
12.	All agreement entered into by the Company from the date of its termination.
13.	All show cause notice or any other notice received from any statutory , government departments, Judicial or Quasi-judicial authority etc.
