

SURAJ INDUSTRIES LTD

Registered Office :- Plot No.-2, Phase - 3, Sansarpur Terrace, Distt. Kangra, H.P.-173212

CIN : L26943HP1992PLC016791

E-mail : secretarial@surajindustries.org | Website- www.surajindustries.org

Telephone No: 01970-256414

Policy for Preservation of Documents

{Pursuant to regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015}

1. INTRODUCTION

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations") requires the Board of Directors of listed companies to frame a policy for providing framework for adequate protection and preservation of the documents of the Company as per the applicable statutory requirements.

Accordingly, the Board of Directors of **SURAJ INDUSTRIES LTD** has adopted this Policy for Preservation of Documents ("the Policy") and to establish the framework needed for effective preservation / maintenance of documents and other records of the Company that are required to be maintained under the said Listing Regulations.

The Board may amend this Policy from time to time as they may deem fit and/or to incorporate any subsequent amendment(s)/modification(s) in the Listing Regulations with respect to matters covered under this Policy or otherwise.

2. PURPOSE OF THE POLICY

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows

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

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

3. DEFINITIONS

"**Board of Directors**" or "**Board**" means the Board of Directors of SURAJ INDUSTRIES LTD., as Constituted/re-constituted from time to time.

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“**Company**” means **SURAJ INDUSTRIES LTD**.

“**Listing Regulations**” means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Policy**” or “this Policy” means Policy for Preservation of Documents.

“**Stock Exchanges**” means the stock exchanges where the Company’s shares are listed.

“**SEBI**” means Securities & Exchange Board of India.

The words, terms and expressions used in this Policy shall have the same meaning as given in SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

4. PRESERVATION OF DOCUMENTS

A) Documents as per Annexure A and those which are required to be maintained under various Acts/Rules/Regulations applicable to the Company shall be maintained and preserved as per the provisions content therein.

B) The Documents Preservation Schedule is annexed herewith as “**Annexure A**” for the guidance of the concerned departments of the Company.

C) It shall be the responsibility of the concerned head of department to keep the annexed Documents Preservation Schedule updated from time to time to ensure that it is in compliance with the various Acts/Rules/Regulations applicable to their respective Departments and for this purpose, they shall communicate any changes desired in the above mentioned Schedule to the Company Secretary.

D) In case of any inconsistency in the annexed Documents Preservation Schedule and the provisions of various Acts/Rules/Regulations applicable to the Company, such provisions shall prevail.

E) The documents mentioned above can be maintained by the Company in physical or electronic or digital mode, if permitted under the applicable Acts/Rules/Regulations.

F) The concerned head of department shall keep in his custody the documents which are of important and/or confidential nature and list of the same shall be maintained in a Register to be kept in his/her custody and he/she shall be responsible for the preservation of the same. The said documents along with the

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Register shall be handed over by him/her to the successor in the event of such head of department leaving the Company/Department.

5. DESTRUCTION OF DOCUMENTS

A) The Documents that are no longer required as per the time schedule prescribed in the ANNEXURE B may be destroyed. The Responsible Officers may direct the relevant employees from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under **ANNEXURE – B**. 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 the Documents in the format prescribed.

B) In case any specific procedure is prescribed under applicable Act/ Rule/ Regulation for destruction of the documents, the same shall be followed by the Company.

C) Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed off finally.

6. DISCLOSURES

The Company shall disclose this Policy on its website and a web link thereto shall be provided in the Annual Report.

7. AMENDMENTS

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

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ANNEXURE - A **Documents Preservation Schedule**

Sr. No	Concerned Department	Records	Preservation Period
1	Secretarial	Certificate of Incorporation, Certificate of Change in Name etc. Statutory Registers Register of Members Index of Members MCA Forms Scrutinizers Reports Annual Audit Reports and Financial Statements Minutes of the meetings of the Board of Directors and of its Committees Minutes of all meetings of shareholders Statutory filings with the Stock Exchanges, SEBI, Ministry of Corporate Affairs, Reserve Bank of India and any	Permanent

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		other statutory/ regulatory authority	
		Applications and approvals for issuance and listing of securities	
		Annual Returns	8 year
		General Meeting Attendance Register	
		Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	
		Office copies of Notice of General Meeting and related papers	
		Board Agenda & supporting documents	
2	Legal	Original Property Purchase and Sale Agreement	Permanent
		Property Card, Ownership records issued by Government Authority	

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		Court Orders	
		Legal Memoranda and opinion including subject matter files	3 Years after the close of Matter
		Litigation files	
		Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other 8 Years after termination or expiration of contracts supportive documentation)	8 Years after termination or expiration of contracts
3	Finance & Account	Tax Exemption and Related documents	Permanent
		Group Insurance Plans	Until plan is amended or terminated
		Insurance Policies	4 Years
		Annual Plans and Budgets	
		Bank Statements	
		Investment Records	8 Years
		Journal Entry support data	
		Books of Accounts, Ledgers and	8 Years from the end of Financial

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		Vouchers	Year or completion of assessment under Income Tax whichever is later
		Excise Records	
		Tax Deducted at Source Records	
		Income Tax papers	
		Service Tax papers	
4	Information Technology	Documents in relation to procurement of IT hardware, software, licenses etc.	Eight financial years or such period as may be specified under applicable law/statute etc.
		Operations & User Manuals	
		License and Information Security Register	
		Server logs	
		Disaster Recovery Site logs	As per IT Policy of the Company
E-mails & Other related Documents			
5	Human Resource	Payroll Registers	8 Years
		Bonus, Gratuity and other Statutory Records	
		Unclaimed Wages Records	
		Employees Medical Record	3 Years after separation
		Time office Records and Leave Cards	3 Years
		Employees Information Records	8 Years after separation

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6	Human Resource & Admin	Factory License and Permissions	Permanent
7	Purchase	Purchase Order and related Correspondence	3 Years from the end of Financial Year
8	Marketing & Sales	Final copies of marketing and sales Documents Sales & Marketing policies Excise Invoices Debit Note/Credit Notes Credit Appraisal Forms & Ratings Agreements with Agents Collection Advices & Related MIS Other related Documents	Eight financial years or such period as may be specified under applicable law/statute etc.

Where the preservation period of Documents is not included in the above identified Categories, such period shall be determined by the application of the general guidelines affecting Document preservation identified in this Policy, as well as any other pertinent actors.

Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department in writing.

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ANNEXURE - B

Specimen format of the register of documents disposed-off / destroyed

Particulars of document along with provision of law	Date and mode of destruction	Initials of the authorised person

Sd/-

Syed Azizur Raman

(Director)