

SUNAYANA INVESTMENT CO LTD

**POLICY ON PRESERVATION OF
DOCUMENTS**

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1. Preface

Regulation 9 of the Securities Board of India [Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "SEBI (LODR) Regulations or "Regulations") requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electrical Mode.

2. Scope

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. Definitions:

The definitions of some of the key terms used in this Policy are given below.

- a. **"Act"** means the Companies Act, 2013 and the rules framed there under and any amendments made thereto.
- b. **"Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 and any amendments thereto.
- c. **"Company"** shall mean **"Sunayana Investment Co Ltd"**.
- d. **"Board of Directors" or "Board"** shall mean Board of Directors of Sunayana Investment Co Ltd" as constituted from time to time.
- e. **"Documents"** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc. And the like as required to be maintained under any law or regulation for the time being in force.
- f. **"Maintenance"** means keeping documents either in physical or electronic form.
- g. **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.

- h. **“Electronic Form”** means any contemporaneous electronic device as computer, laptop, compact disc, space or electronic cloud, or any other form of storage or retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

4. Interpretation

Terms that have not been defined in this policy shall have same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015.

5. Objective

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- a. The documents of a Permanent nature (listed in Annexure A) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, deletions or any changes made there under from time to time.

Provided all such modifications, amendments, deletions shall be preserved by the Company permanently.

- b. The documents to be maintained for a specified time after completion of relevant transaction (as listed in Annexure B) shall be preserved by the Company for the period of not less than 8 years after completion of the relevant transaction subject to the modifications, amendments, deletions or any changes made there under from time to time.

Provided all such modifications, amendments, deletions shall be preserved by the Company for the period of not less than 8 years.

6. Mode of Preservation

The documents may be preserved in the following manner:

- a. Physical Mode or
- b. Electronic Mode

The officer of the Company required to preserve the documents shall be the Authorized Person who is generally expected to observe the Compliance requirements of the applicable law.

The preservation of documents should be such as to ensure that there is no tempering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the Authorized Person with preservation, so as to ensure integrity of documents and prohibit unauthorized access.

7. Custody of documents

Subject to the Applicable law, the custody of all the documents shall be with the Authorised Person. Where such Authorised Person tenders resignation or he is transferred to any other location then he shall hand over all the relevant documents, lock and key, access control or password, or company disc other storage devices or such other documents and devices in his possession under the Policy. The Board may appoint any other person as the Authorised Person as it may deem fit.

8. Destruction of Documents

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for a short term use only. This applies to both physical as well as electronic documents.

The temporary documents shall be destroyed after the relevant or prescribed period by the Authorised Person in whose custody it is with the prior approval of the Board or any other authority as required under the applicable law pursuant to which the documents have been preserved.

A register of the documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the documents disposed, date of disposal and the mode of disposal. (As per the format as Annexure D)

The entries in the register shall be authenticated by the Authorised Person.

9. Policy Review

This policy shall be reviewed time to time so that policy remains compliant with applicable legal requirements.

ANNEXURE - A

A) Permanent Preservation

- a. Common Seal
- b. Minutes book of Board, General Meetings and Committee Meetings
- c. Statutory Registers
- d. License and Permissions
- e. Statutory forms and disclosures except from routing compliances
- f. Scrutinizer's Report
- g. Register of Members
- h. Index of Members

B) Temporary Preservation up to 8 years

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. All notices pertaining to disclosure of interest of directors
- e. Instrument creating a charge or modification
- f. Books of accounts, financial statements etc.
- g. Register of debenture holders or any other security holders

C) Others

As per applicable law.

ANNEXURE - D

Specimen format of the register of documents disposed of/ destroyed

Particulars of document along with provision of law	Date and Mode of Destruction	Initials of the Authorised Person