

PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

PREAMBLE

The Securities Exchange Board of India (SEBI), on September 2, 2015, has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**"the Regulations"**). As per Regulation 9 and Regulation 30 (8) (a) of the Listing Regulation, Shri Kalyan Holdings Limited (**"the Company"**) has adopted a policy namely "Policy on Preservation and Archival of Documents" (**"the Policy"**) by passing a Board resolution on 13th December 2019.

The Policy ensures that all the necessary documents and records of the Company are adequately protected, preserved and disposed-off as required under various statutes, laws, rules, regulations for the time being in force. The Policy also governs the archival of documents hosted on the website of the Company. The Policy creates an obligation on the employees of the Company for retention and preservation of documents which are required to be maintained.

OBJECTIVE

The purpose of this policy is to establish the framework for the purpose of preservation of documents and their destruction after the statutory period of preservation is over and documents are no longer required and also to archive any of the material of events or information which are disclosed by the Company to the Stock Exchanges prior to the period of five years in terms of Regulation 30. In terms of Regulation 9 of the Listing Regulations, for the purpose of preservation, the documents under the policy are to be classified as:

1. Documents to be preserved permanently.
2. Documents to be preserved for a period of not less than 8 years.

Definitions

"Act" shall mean the Companies Act, 2013, rules framed there under and any amendments thereto.

"Company" means Shri Kalyan Holdings Limited unless the context otherwise provides.

"Applicable Law" means any law, rules, circulars, guidelines, notification or standards under which the preservation of Documents has been prescribed.

"Compliance Officer" means compliance officer appointed in terms of regulation 6 of the Listing Regulations

"Documents" includes a memorandum, summons, order of a judicial regulatory or administrative authority, an email, a contract, registers maintained by the company under the provisions of a statute, books of account, a payment voucher, minutes of the meeting of the members or board of directors or any committee of board of directors or management, returns or reports filed with statutory authorities or the regulators, tax records, press release, etc.

"Listing Regulations" means the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“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.

“Preservation” means to keep in good order or to prevent from being damaged or destroyed.

All other words and expressions used but not defined in this policy but defined in the SEBI Act, 1992, 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 may be.

Scope of the Policy

The Policy applies to all the documents in electronic or physical form maintained by the Company and its subsidiaries.

Preservation and Archival of Documents

The Company shall maintain and preserve the documents either in physical or electronic mode as permitted by the applicable laws.

The documents of the Company shall be preserved in the following manner:

1. Documents mentioned in Annexure A shall be preserved and maintained perpetually by the Company subject to the modifications, amendments, additions or deletions or any changes made therein from time to time. Provided that the Company shall also preserve all such modifications, amendments, additions or deletions in the documents permanently.

2. Documents listed in Annexure B whose preservation shall be temporary in nature and shall be maintained in the following manner:

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- All such documents having preservation period of 8 (eight) years or period as per applicable laws, shall be preserved for such period as prescribed under the applicable laws but not less than 8 (eight) years.
- All other documents for which the period of preservation is not prescribed under any laws shall be preserved for a minimum period of 8 (eight) years or any such specific period as the Company deems necessary.
- In case of overseas Subsidiaries/entities, such Subsidiary/entity shall also comply with the requirements of local law for preservation documents, in addition to the requirements stipulated through this policy.

3. In line with the Company's Policy on Determination of Materiality of Events and as per the Regulations, the Company shall disclose all material events to the Stock Exchanges and ensure that such events or information as disclosed to the Stock Exchange/s shall be made available on the Company's website for a period of 5 (five) years and thereafter backup of the soft copy shall be maintained on local server for a period of 3 (three) years.

4. All departments of the Company shall ensure that the documents pertaining to their department are preserved as per the Policy. It shall be the duty of the Heads of Department (“HOD”) to ensure that they comply with the requirements of the Policy.

5. Any violation of this Policy by any employee may result in stringent action which may include immediate termination of employment as well. The Board of Directors at its own discretion may give an opportunity of being heard to any employee.

6. The backup be maintained on scheduled time and day of all documents pertaining to the period prior to one preceding financial on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records shall also be maintained in such a manner that their retrieval is easy and quick.

7. The Company has identified a list of documents with their respective period of preservation, which is given as an annexure to this Policy. The list is illustrative and not exhaustive.

Disposal and Destruction of Documents

The documents listed in **Annexure B**, which no longer require any preservation may be destroyed. The Compliance officer may direct employees in charge from time to time to destroy the documents which are no longer required to be preserved 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 of the documents in the format prescribed as **Annexure C**. The entries in the register shall be authenticated by the HOD of that department.

Amendment

The Board shall have power to amend any of the provisions of the Policy, substitute any of the provisions with a new provision or replace the Policy entirely with a new Policy according to subsequent modification(s)/amendment(s) to the Regulations.

Annexure-A Documents whose preservation shall be permanent in nature

Sr. No.	Particulars
1.	Documents and information filed with ROC for Incorporation of the Company
2.	Common seal, certificate of incorporation and certificate of change of name, if any)
3.	Certificate for commencement of business, if any
4.	Memorandum of Association and Articles of Association as amended from time to time
5.	Agreements made by the Company with the Stock Exchanges and Depositories, etc.
6.	Minutes Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013 and the Regulation
7.	Cancelled Share certificates
8.	Licenses and permissions
9.	Order from Courts and any other regulatory authorities

10.	Statutory registers required to be maintained under various applicable laws
11.	Any other documents as may be required to be maintained in terms of applicable law(s) and preserved from time to time
12.	Scrutinizers report

Annexure-B
Documents whose preservation is not permanent in nature

Sr. No.	Particulars	Preservation Period
1.	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
2.	Attendance Register of Board/General Meeting	8 years
3.	Income tax papers	8 years from the end of Financial Year or completion of assessment under income tax, whichever is later
4.	Notices of General Meetings/ other such meetings and supporting documents all other	8 years from the date of meeting
5.	Employees Information Records	8 years after resignation/ separation
6.	Disclosure of interest by the Directors	8 Years
7.	Instrument creating a charge or modification	8 Years
8.	Books of accounts and financial statements etc.	8 Years
9.	Any other important documents including tax filling and papers, project documents and any other such documents and papers.	8 Years

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

Sr. No.	Particulars of document along with provision of law	Department responsible for creation and maintenance of documents	Date of approval of the compliance officer	Date and mode of destruction	Signature of the compliance officer