

# **SM AUTO STAMPING LIMITED**

## **POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS**

### **PREAMBLE:**

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (Hereinafter called as “The Regulations”) every listed Company shall frame a policy on preservation of documents. This policy inter alia provides for preservation of documents where such preservation shall be of permanent nature as also documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

### **PURPOSE OF THE POLICY:**

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company’s approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company’s commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents.

This policy seeks to ensure that the Company’s business is adequately documented that are then managed in accordance with best practice. Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

### **SCOPE:**

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

### **DEFINITIONS:**

- a) “Act” means the Companies Act, 2013 including any amendment or modification thereof.
- b) “Board” means Board of Directors of SM Auto Stamping Limited, as constituted from time to time.

- c) "Company" means SM Auto Stamping Limited.
- d) "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- e) "Electronic Record(s)" means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- f) "Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and 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.
- g) "Key Managerial Personnel" mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.
- h) "Policy" means policy on Preservation of Documents.
- i) "Preservation" is maintenance of documents, files and documents in usable form.
- j) "Regulations" mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- k) "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- l) "Stock Exchange or Exchanges" mean Bombay Stock Exchange Limited and National Stock Exchange of India Limited
- m) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

#### **MODES OF PRESERVATION:**

The Documents may be preserved in

- Physical form or
- Electronic Form.

#### **CREATION OF DOCUMENTS:**

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should:

- i. facilitate necessary action by employees and their successors at any level at all points of time;
- ii. facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- iii. Protect the financial, legal and other rights of the organization, its clients and any other people affected by its actions and decisions.

#### **MAINTAINENCE OF DOCUMENTS:**

Every associate of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

- i. Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitized in business processes.
- ii. Physical documents to be maintained in books and files.
- iii. All digital and physical records to be saved at the Registered Office of the Company and no physical records can be migrated without permission of the respective Department Head.
- iv. A reproduction of any original record on microfilm or on any other medium shall be certified by the respective Head of Department of the Company to be a true and accurate reproduction of the original of such document.

#### **DISPOSAL AND DESTRUCTION OF DOCUMENTS:**

- i. All documents mentioned in Category A which are temporary in nature must be preserved for a period not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed. However, all documents mentioned in Category B need to be permanently preserved by the Company during its entire life time.

Utmost care is to be taken to ensure that files are well preserved.

ii. The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Department Head for the purpose. Inspection of this register is restricted.

<b>Sr. No.</b>	<b>Category A</b>	<b>Category B</b>
1.	Proxy Form	Certificate of Incorporation
2.	Representation Letters	Certificate of change of name (if any)
3.	Annual Return	Memorandum and Articles of Association as amended from time to time
4.	Instrument of Charge	Minutes Book
5.	Circular Resolution	Statutory Registers
6.	Consent and Resignation Letters	
7.	Annual Financial Statements	
8.	Declaration by directors under Section 164 and 184 of the Companies Act, 2013	
9.	Documents on which Common Seal has been affixed	
10.	Notices of General Meeting	
11.	All documents under the Listing Regulations	
12.	Advertisements published	
13.	Disclosures under Takeover Code	
14.	Inward file giving information about the various correspondence received from outside agencies requiring secretarial action	

### **EFFECTIVE DATE**

The policy shall be effective from 20.12.2019.

### **REVIEW**

This Policy shall be subject to review from time to time by the Board as may be deemed necessary and in accordance with any regulatory amendments.