

## POLICY FOR PRESERVATION OF REGISTERS & DOCUMENTS OF THE COMPANY & DISPOSAL THEREOF

### PREAMBLE

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents

### SCOPE:

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

### OBJECTIVE

The Policy for Preservation of Registers & Documents of the Company & Disposal thereof (“the Policy”) has been formulated with a view to provide a standard guideline for manner of preservation and disposal of the registers, records and other documents of the Company.

The Policy lays down broad guidelines to

- identify the records to be maintained and preserved permanently or for a certain time period as per the applicable legal and operational requirements.
- decide the mode and manner of preserving the documents, whether in physical form or in electronic form.
- decide the procedure to destroy the documents after eight years or other applicable period.
- To help employees in understanding their obligations in retaining and preserving the documents and records.

### DEFINITIONS:

“Act” means the Companies Act, 2013, Rules framed thereunder and any amendments/substitutions thereto.

“Board of Directors” or “Board” means the collective body of the Directors of the Company.

“Company”, “This Company”, “The Company”, wherever occur in the policy shall mean “Swiss Glascoat Equipments Limited”

“Current” means running matter or whatever is at present in course of passage.

“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.

“Maintenance” means keeping documents, either physically or in electronic form.

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“**Preservation**” means to keep the documents preventing them from being altered, damaged or destroyed.

“**Register**” means a register maintained under the Companies Act, 2013 or the SEBI Act, 1992 and any amendments/ substitutions thereto.

“**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments/ substitutions thereto.

“**Operational requirements**” means any such requirements related to business or operations that determines the requirements for preservation and maintenance of records of the Company.

### INTERPRETATION:

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

### PRESERVATION OF DOCUMENTS

The policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following categories as per indicative list (**Annexure I**)

- A. The documents of a permanent nature shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.
- B. The documents to be maintained and preserved by the Company for the term not less than eight years or such specified period after completion of the relevant transactions as per the applicable legal and operational requirements subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.
- C. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

### MODES AND MANNER OF PRESERVATION:

- The Documents may be preserved either in
  - a. Physical form; or
  - b. Electronic Form
- Each Department of the Company shall preserve the registers & documents as per the respective applicable legal statutes and operational requirements, subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term as per the respective applicable legal statutes and operational requirements.

- A Register shall be maintained stating the brief particulars of the registers and documents so

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maintained viz, name, periods for which the related registers and documents are required to be maintained as per applicable legal and operational provisions and actual compliance with the said provisions, location and the mode of preservation, etc.

- The preservation of documents should be such as to ensure that there is no tampering, 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 concerned Authorised Person, so as to ensure integrity of the documents and to prohibit unauthorized access.

### **DISPOSAL OF REGISTERS & DOCUMENTS**

- Each Department of the Company shall prepare a list, signed by the Head of the Department (HoD), related to the registers and documents which are no longer required as per the time schedule and can be disposed off after expiry of certain period as per the applicable legal & operational requirements.
- The aforesaid list shall be submitted to the Internal Working Committee (IWC) of the Company. The IWC thereafter shall circulate the said list to other departments of the Company and invite opinions of the other departmental heads related to the preservation/ disposal requirements of the concerned registers/ documents.
- The IWC shall take final decision of the disposal of the registers/ documents as mentioned in the list provided by the concerned HoD and shall direct the latter to dispose off the said registers/ documents.
- Each department of the Company shall maintain a register (**Annexure II**) wherein the brief particulars of the records/ documents destroyed shall be entered and all entries made therein shall be authenticated by the Head of the Department.
- The registers and documents which are required to be preserved permanently shall not to be destroyed in any case.

### **INTERNAL WORKING COMMITTEE (IWC) OF THE COMPANY**

- The IWC shall consist of such members as decided by the Board of the Company.
- The IWC shall meet once in a year or as required. The IWC shall send a notice to each HoD for preparation of list of registers/ records that are to be disposed off as per their legal/ operational requirements, along with the details of the meeting to be convened wherein the decision related to the said disposal shall be taken.
- The IWC shall ensure that the HoDs maintain updated Registers related to Preservation & Disposal of documents of the Company

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### **ARCHIVAL OF DOCUMENTS UPLOADED ON WEBSITE**

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 3 (Three) years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 1 (One) year.

### **RESPONSIBILITY FOR PRESERVATION, MAINTENANCE & DISPOSAL OF REGISTERS & DOCUMENTS OF THE COMPANY**

- The HoDs have final responsibility for the preservation, maintenance and disposal of registers and documents pertaining to their departments.
- The HoDs may delegate the responsibility to preserve and/ or destroy the documents to any other employee of their department, subject to the final responsibility lying with the concerned Head of the department.
- The HoDs of the Company are responsible for maintaining updated Registers related to Preservation & Disposal of documents of the Company, duly authenticated by affixing their signatures to the same.

In the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

Questions regarding this policy should be addressed to the Company Secretary at [share@glascoat.com](mailto:share@glascoat.com)

### **COMMUNICATION AND DISSEMINATION OF THE POLICY**

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the web-site of the Company.

### **GENERAL**

- Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.
- The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

### **AMENDMENT**

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to

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subsequent modification(s)/ amendment(s) to Regulations. However, no such amendment or modification or substitution shall be inconsistent with the applicable provisions of any law for the time being in force.

For & on behalf of the Board of  
**Swiss Glascoat Equipments Limited**

Sd/-  
Mr. Himanshu Patel  
**Chairperson and Managing Director**

**Date:** 08.09.2017

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**ANNEXURE I: INDICATIVE LIST RELATED TO PRESERVATION OF DOCUMENTS**

**A. PERMANENT PRESERVATION:**

- i. Common Seal
- ii. Minutes books of Board, General Meetings and Committee Meetings
- iii. Statutory Registers required under applicable legal laws
- iv. License, Permissions & Statutory Approvals
- v. Statutory Forms and disclosures except for routine compliance
- vi. Audited Financial Statements along with Audit Reports
- vii. Register of Members and index thereof
- viii. Material Agreements and Contracts
- ix. Orders/ Approvals issued by the Court/ Statutory bodies
- x. Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

**B. TEMPORARY PRESERVATION UPTO 8 YEARS OR AS PER OTHER APPLICABLE LEGAL/ OPERATIONAL STANDARDS:**

- i. Annual Returns
- ii. Board Agenda and supporting documents
- iii. Attendance Register
- iv. Office copies of Notice of General Meeting and related papers
- v. Office copies of Notice of Board Meeting/ Committee Meeting, Notes on Agenda and other related papers
- vi. All notices pertaining to disclosure of interest of directors
- vii. Instrument creating a charge or modification
- viii. Books of accounts, financial statements etc.
- ix. Register of debenture holders or any other security holders
- x. Correspondences with the other authorities/ agencies/ shareholders
- xi. Personnel documents
- xii. Non-Statutory Registers/Documents
- xiii. Films, Videos, CDs, DVDs, tapes etc.
- xiv. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

**C. OTHERS:**

As per applicable law.

**APPENDIX II: REGISTER FOR DISPOSAL OF RECORDS**

Ref. No.	Name of Register/ Document	Reference no. in Register for Preservation of Records	Date of disposal	Manner of Disposal	Signature of Head of Department	Name of Head of Department
D/001						
D/002						