

SUNGOLD CAPITAL LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

I. Preamble:

The Board of Directors (**the “Board”**) of **Sungold Capital Limited (the “Company”)** has adopted the following Policy (**“The Policy”**) of the Company in its meeting held on **October 30, 2015**, for preservation of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015(**“Listing Regulations”**).

II. Objective:

The purpose of this policy is to provide a comprehensive methodology on the preservation and conservation of the Company’s records and documents. It provides guidance on preservation and management of documents to help ensure the authenticity, reliability and accessibility of such documents. The policy aims at identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records. It stipulates the duration and manner in and place at which records and documents of the Company shall be preserved. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements

III. Guideline:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the 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 preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. documents that needs to be preserved and retained permanently;
- b. documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or listing Regulation.
- c. documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.
- d. where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

An indicative list of the Documents and the time-frame of their preservation is provided in **Annexure- I**

IV. Mode of Preservation and Authorized person:

The Documents may be preserved in

- a) Physical form; or
- b) Electronic Form.

The Company Secretary/Compliance officer or any KMP appointed by the Board of Directors of the Company are responsible for taking into account the potential impacts on preservation of documents in their work area and their decision to retain/preserve or destroy, documents pertaining to their areas.

The preserved documents must be accessible at all reasonable times. Access may be controlled by Company Secretary/Compliance officer or

any KMP appointed by the Board of Directors of the Company with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

- Destruction of documents

The documents of the Company which are no longer required as per the time schedule prescribed in the Annexure A may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under **Annexure I**. 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 at **Annexure II**. The entries in the register shall be authenticated by the Company Secretary/Compliance officer.

V. Suspension of Documents disposal in the event of Litigation or Claims

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice / Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

VI. Review:

The board may review and amend this policy from time to time to comply with any regulatory amendments or statutory modifications. This policy is made available on the website of the Company www.sungoldcapitallimited.com.

This policy shall be applicable from 1st December, 2015.

ANNEXURE – I

Indicative list

A) PERMANENT PRESERVATION:

- a. Common Seal
- b. Memorandum and Article of Association
- c. Minutes books of Board, General Meetings and Committee Meetings
- d. Statutory Registers
- e. Register of Members
- f. Index of Members
- g. License and Permissions
- h. Statutory Forms and disclosures except for routine compliance
- i. Scrutinizers' Reports
- j. Annual Audit Reports and Financial Statements
- k. Court orders
- l. Original Sale and Purchase Agreements/Deed
- m. Government records
- n. All E-mails from internal and external sources that are important and have significant impact and lasting consequences.
- o. Press release and publicly filed documents

B) TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting / Committee Meeting,
- f. Notes on Agenda and other related papers
- g. All notices pertaining to disclosure of interest of directors
- h. Instrument creating a charge or modification
- i. Books of accounts, financial statements, TDS, ledger, vouchers, bank statement, Investment records, income tax etc, Payment challans.
- j. Tax exemption and related documents
- k. Contracts, Agreements and Related correspondence
(including any proposal that resulted in the contract and other supportive documentation)
- l. Project Documents and Related correspondence (including any proposal of the Project & its approval)
- m. Other legal documents

C) OTHERS:

- a. All E-mails from internal and external sources that are not important and have no significant impact and lasting consequences for 2 years
- a. Inspection / Survey Reports for 2 years
- b. Insurance Policies for moveable / immovable assets, vehicles, etc. for 2 years
- c. Claim Records for 12 months after settlement of the claim
- d. Legal Memoranda and Opinions including subject matter files for 3 years after the close of the matter.
- e. Notice for documents from statutory authority or any litigation commenced by or against the Company for 3 years after the matter is settled or resolved or disposed off.

ANNEXURE – II

**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 Company secretary or authorized person