

SANDHAR

SANDHAR TECHNOLOGIES LTD.

POLICY FOR PRESERVATION OF DOCUMENTS
AND ARCHIVAL OF DOCUMENTS

{Pursuant to SEBI (Listing Obligations and Disclosure Requirements), 2015}

SANDHAR TECHNOLOGIES LIMITED

(Policy for preservation of documents and archival of documents)

1. Preamble

The Board of Directors of Sandhar Technologies Limited has approved the Policy on Preservation and Archival of Documents ("The Policy") on February 02, 2019. This Policy has been formulated in accordance with the Regulation 9 read with Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. Objective

The objective of this Policy is to ensure that all the necessary data, information, documents and records of the Company, whether paper based or electronic based, are adequately protected and preserved as per the statutory requirements and as defined here under. This Policy facilitates the employees in handling the documents efficiently either in physical form or in electronic form. It also covers the various aspects on preservation of the documents, their archival and safe disposal/destruction.

3. Definitions

- A. "**Authorised Person**" means the functional head of the concerned department or any other person duly authorised by the Board or the Managing Director or the Whole Time Director of the Company.
- B. "**Board of Directors**" or "**Board**" shall mean the Board of Directors of Sandhar Technologies Limited, as constituted from time to time.
- C. "**Company**" shall mean "**Sandhar Technologies Limited**".
- D. "**Compliance Officer**" means compliance officer appointed in terms of regulation 6 of the Listing Regulations.
- 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. "**Listing Regulations**" shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

4. Classification for Preservation of Documents

The preservation of Documents shall be done in the following manner:

Class A Documents: Documents which are to be preserved permanently, either under Applicable Law or as determined by the Authorised Person. An indicative list of Class A Document has been set out at *Annexure I*.

Class B Documents: Document which are required to be preserved for not less than eight years after the completion of the relevant transactions under Applicable Law or as determined by the Authorised Person. An indicative list of Class B Document has been set out at *Annexure II*.

Class C Documents: Documents not covered in Class A and B above, whether required to be preserved under Applicable Law or determined by the Authorised Person.

The documents under Class C shall, inter-alia, cover the documents which are required to be preserved for their minimum retention period as shall be described from time to time through internal circulars to all departments of Units and Corporate Office located at several places and subsequent amendments thereto.

5. Roles and Responsibilities

This policy is applicable to all departments and Units of the Company. Each employee shall abide by the Policy. The Authorised Person shall guide the employees and ensure that they identify and classify documents and take appropriate action with regard to their preservation in accordance with this Policy. The Authorised Person shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

6. Custody of the Documents

Subject to the applicable Law, the custody of the documents shall be with the Authorised Person.

Important original documents shall be kept in a secure location. Electronic data shall be backed up by the IT department.

Notwithstanding anything contained elsewhere in the Policy but subject to the requirements of Applicable Law, the Authorised Person may permit other means of storage including usage of a third party service provider or a centralized system of storage for the Preservation of Documents.

Notwithstanding anything contained above, where any documents are required to be maintained at the Registered Office of the Company, then they shall be maintained at such place or in accordance with any approval obtained therein from the Board and/or shareholders or any governmental regulatory authorities, as the case may be.

7. Destruction of documents

After the expiry of the retention period, the preserved documents as classified above may be shredded or destroyed in such mode under any instructions approved by the Authorised Person. However for secrecy, the Authorised Person should ensure that no preserved document in physical mode, after the retention period, be sold out in the market or reused. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

Where there is no such requirement of the statutory retention period, the documents may be retained for such period and then destroyed, as deemed fit by the Authorised Person.

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 destruction 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 Authorised Person shall immediately inform all concerned employees of the Company for suspension of further destruction of documents.

8. Register of documents destroyed

A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the Authorised Person.

The format of the register has been set out at *Annexure III*.

9. Dissemination of this 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 e-mailed / handed over within one month of the adoption of this Policy by the Board of Directors of the Company and shall also be posted on the web-site of the Company.

10. Archiving of Documents which are hosted on the Company's website

The Company is required to disseminate and host the information and documents on its website under various provisions of the Listing Regulations, Companies Act, 2013 and other applicable laws. The Company is also required to frame an Archival Policy to shift such information and documents in Archives.

The list of information and documents to be disseminated by the Company on its website along with the period of hosting and archiving has been set out at *Annexure IV*.

11. E-Data and Information Backup, Retention and Archiving

11.1 Data & Information Backup

Company has obtained ISO:27001 (2013) (Information Security Systems) which lays down, inter-alia, the policy pertaining to the backup, retention and archiving of data and information. Backup copies of data and information ensures that the original data & information could be recovered and restored, in the event of data loss. The following aspects should be followed for guidance in order to ensure effectiveness of data information backup, retention and archiving:

- 1) The Company to ensure regular backup so that the business requirements are addressed and the retention period of backup are defined as per compliance and business needs.
- 2) The Company has decided the frequency and retention period of backup as follows:
 - Oracle Database & ERP- Daily incremental and weekly complete backup is scheduled on Disk, Tapes & Cloud. Retention period is 15 years.
 - Sapphire Application (IT related Complaints Logging application) - Manual backup is taken on monthly basis. Retention period is 1 month.
 - Sapphire Database (IT related Complaints Database) - Manual backup is taken on daily basis. Retention period is 1 Day.
 - Emails- Automated backup provided by Google for Top 30 critical users taken on cloud for unlimited storage. Retention period is 15 years.
 - Tally Server- Manual backup is taken on monthly basis. Retention period is 1 month.
 - Windows- Manual backup is taken on monthly basis. Retention period is 1 month.
- 3) End users are responsible for taking and maintaining the backup of all critical data residing on their individual workstations. The Company assign minimum 5GB of network space to every user on file server. In case Laptops, only critical user's (GM & above) laptops are backed up manually on monthly basis. (*Refer: Backup Tracker – End User & Tally*)
- 4) Backup records (including backup software logs) for Design data, Oracle data, HR Payroll, Accops Hi-secure, Trend Micro, DC, Sapphire are kept up-to-date when the backup process starts and ends. In case the backup fails, the occurrence is recorded and escalated to IT Head/ Section Head for further action.
- 5) All backup records are protected from unauthorized access by use of password Protection/ Encryption.
- 6) Configuration of critical devices which includes but not limited to Servers, Firewall, Routers, and Switches are backed up on monthly basis or whenever there is a requirement of it.
- 7) The backup media is always precisely labelled and accurate records are maintained of back-up done and to which back-up set they belong.
- 8) Backup software logs are monitored on daily basis and are stored securely for possible future reference.
- 9) Monitoring of backup is performed by Section Head / Person designated by Section Head on a Monthly basis.
- 10) Backup media is stored on-site in fire proof safe and off-site at The Company manufacturing unit situated at Bawal, (HR), with appropriate level of physical and environmental protection.

11) Restoration testing of backed up data is performed on a Monthly basis based on the criticality of data.

12. 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.

13. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

Annexure - I

Documents whose preservation shall be permanent in nature

S.No	Nature of Document(s)
01	Registration Certificates
02	Licenses & Statutory Approvals
03	Statutory Registers required under applicable laws
04	Audited financial statements
05	Minutes of General Meeting
06	Minutes of Board Meeting
07	Minutes of various Committee Meetings
08	Material Agreements/Contracts
09	Orders issued by Courts/Statutory bodies
10	Investment Documents/proofs including certificates etc.
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure - II

Documents with preservation period of not less than eight years after completion of the relevant transactions

S.No	Nature of Document(s)
01	Books of Account together with relevant vouchers (Not less than 8 financial year)
02	Instrument Creating a Charge or modification thereon(8 years from the date of satisfaction of charge)
03	Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)(MGT-2)
04	Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)
05	Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)
06	All notices pertaining to disclosure of interest of directors(MBP-1)for a period of 8 years from the end of the financial year to which it relates)
07	All certificates surrendered to a company (3 years from date of surrender)
08	Register of deposits (not less than 8 years from the date of last entry)

09	The postal ballot and all other papers relating to postal ballot including voting by electronic means, (as long as they remain current or for 8 financial years), whichever is later.
10	All books and documents relating to the issue of share certificates, including the blank forms of share certificates not less than 30 years
11	Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode (8 Financial years)(SS-1)
12	Copies of Notices, Agenda, Notes on Agenda and papers related to Board Meeting. (8 Financial Years) (SS-1)
13	Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2)
14	Personnel Documents
15	Insurance Policies under various policies
16	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

Annexure - III

The format of the register of Documents disposed/destroyed –

Particulars of document	Date of destruction	Mode of destruction	Initials of the Authorised person

Annexure – IV

Time period for disclosure of information and documents on Company's website and thereafter in Archives.

SI. No.	Nature of information / document	To be hosted on the website	In Archives
1.	Details of its business	Permanently, to be updated from time to time.	-
2.	Terms and conditions of appointment of independent director(s)	Up to tenure of the Independent director	To be kept in Archives for 3 years

3.	Composition of various committees of board of directors	Permanently, to be updated from time to time.	-
4.	Code of conduct of board of directors and senior management personnel	Permanently, to be updated from time to time.	-
5.	Details of establishment of vigil mechanism/ Whistle Blower policy	Permanently, to be updated from time to time.	-
6.	Policy on dealing with related party transactions	Permanently, to be updated from time to time.	-
7.	Policy for determining 'material' subsidiaries	Permanently, to be updated from time to time, as and when applicable	-
8.	Details of familiarization programmes imparted to independent directors including the		
	(i) number of programmes attended by independent directors (during the year and on a cumulative basis till date),	5 years	To be kept in Archive for 3 years
	(ii) number of hours spent by independent directors in such programmes (during the year and on cumulative basis till	5 years	To be kept in Archive for 3 years
	(iii) other relevant details	5 years	To be kept in Archive for 3 years
9.	The email address for grievance redressal and other relevant details	Permanently, to be updated from time to time.	-
10.	Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor	Permanently, to be updated from time to time.	-
11.	Financial information including:		
	(i) notice of meeting of the board of directors where financial results shall be discussed	1 year	To be kept in Archive for 1 year

	(ii) financial results, on conclusion of the meeting of the board of directors where the financial results were approved	5 years	To be kept in Archive for 1 year
	(iii) complete copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report etc.	5 years	To be kept in Archive for 3 years.
12.	Shareholding pattern	3 years	To be kept in Archive for 3 years.
13.	Details of agreements entered into with the media companies and/or their associates, etc.	For life time of the agreement	To be kept in Archives for 1 year
14.	Schedule of analyst or institutional investor meet and presentations made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange	1 year	To be kept in Archives for 1 year
15.	New name and the old name of the listed entity for a continuous period of one year, from the date of the last name change	1 year	To be kept in Archives for 1 year
16.	Copies of advertisements published in Newspapers:		
	(a) notice of meeting of the board of directors where financial results shall be discussed	1 year	To be kept in Archives for 1 year
	(b) financial results, as specified in regulation 33, along-with the modified opinion(s) or reservation(s), if any, expressed by the auditor.	1 year	To be kept in Archives for 1 year
	(c) statements of deviation(s) or variation(s) as specified in sub regulation (1) of regulation 32 on quarterly basis, after review by audit committee and its explanation in directors report in annual report	1 year	To be kept in Archives for 1 year
	(d) notices given to shareholders by advertisement.	1 year	To be kept in Archives for 1 year

17.	Disclosures made on the website of all such events or information which has been disclosed to the stock exchanges under Regulation 30 of the Listing Regulations.	5 years	To be kept in Archives for 1 year
18.	Other information or documents as may be prescribed / amended under applicable Laws or by Authorised person	Permanent or for such time period as may be prescribed there under	To be kept in Archives for 1 year