

**POLICY FOR PRESERVATION OF DOCUMENTS
(PHYSICALLY OR ELECTRONIC)
OF
SURYAKRUPA FINANCE LIMITED**

1. Introduction

The purpose of this Policy for Preservation of Documents (hereinafter referred to as “The Policy”) is to ensure that Suryakrupa Finance Limited (hereinafter referred to as the “Company”) retains its official records in complete and accurate manner and in accordance with the requirements of all applicable laws and to ensure that official records no longer needed by the Company are discarded at the proper time. This Policy provides guidelines concerning the length of time official records should be retained under ordinary business circumstances. No director, officer or employee of the Company shall knowingly destroy a document with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case. This policy covers all records and documents of the Company.

2. Policy

This Policy represents the Company’s formal policy regarding the preservation of documents and official records related to and generated in the course of the Company’s operations.

3. Effectiveness

This Policy shall be effective from 1st December, 2015.

4. Record Covered

This Policy applies to all official records generated in the course of the Company’s operations, including but not limited to:

- typed or printed hardcopy (i.e. paper) documents;
- electronic records and documents (e.g., email, web files, text files, PDF files etc.);
- video or digital images;
- graphic representations;
- electronically stored information contained on network servers and/or document management systems;
- recorded audio material (e.g., voicemail);
- other kind of records

4. Definitions

Capitalized terms used but not defined herein shall have the same meaning as assigned thereto in the Listing Regulations, the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder or any other applicable laws or regulations, as the case may be.

“**Act**” means the Companies Act, 2013.

“**Applicable Law**” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

“**Authorised Person**” means any person duly authorised by the Board.

“**Board**” means the Board of directors of the Company or its Committee.

“**Company**” means SURYAKRUPA FINANCE LIMITED.

“**Current Document(s)**” means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

“**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

“**Electronic Record(s)**” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

“**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.

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

“**Regulations**” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

5. Administration:

5.1 Record Preservation Schedule:

Attached to this Policy is a Record Preservation Schedule (Annexure A) that is approved as the maintenance and preservation schedule for official records of the Company. It shall be the duty of the Head of each Department to administer this Policy and implement reasonable processes and procedures concerning the Record Preservation Schedule.

5.2. Distribution of Policy to Employees and Officers:

The Head of the Department will arrange for every officer and employee who may have control over or responsibility for the Company's documents to receive a copy of this Policy and ensure that he or she has received a copy of this Policy, has read and understood it and has agreed to comply with it.

6. Record Storage Procedures:

6.1. Organization of Records:

In order to facilitate administration of this Policy, where practicable, the Company's official records should generally be organized and stored according to general categories in a manner that best facilitates the efficient administration of the Company's operations where appropriate. Records within each category should generally be organized and stored in chronological order or by time period (e.g., by month or year).

6.2. Dating of Records:

Categories of records not required to be retained on a permanent basis (according to the Record Preservation Schedule) should be maintained by date or conspicuously dated to enable such records to be easily identified for destruction at the end of the record preservation period specified in the Record Preservation Schedule.

6.3. Confidentiality of Records:

Records containing confidential information should be labeled and/or stored in a manner to limit access to those employees or other individuals with authorization to view such records. The Company provides its employees with email as a tool for performing its employees' work functions. While the Company understands that employees may use their email to conduct personal business, employees should be aware that they have no expectation of privacy for any information or communications contained in work-related email accounts. The Company reserves the right to review any of the Company's email at any time.

6.4. Electronic Storage System:

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The IT Department of the Company is authorized to develop and implement a system for maintaining the Company's records via an electronic storage system that either images hardcopy records or transfers computerized records to electronic storage media (e.g., hard drives, storage area networks or optical media such as CDs and DVDs).

7. Confidentiality and ownership:

All records are the property of the Company and employees are expected to hold all business records in confidence and to treat them as the Company's assets. Records must be safeguarded and may be disclosed to parties outside of the Company only upon proper authorization. Any subpoena, court order or other request for documents received by employees or questions regarding the release of the Company's records must be directed to the Head of the respective Department, prior to the release of such records. Any records of the Company in possession of an employee must be returned to the employee's successor or person in charge or the Head of the Department, upon termination of employment.

8. Amendments to the Policy:

The Board of Directors shall alter, amend or modify the clauses of this Policy from time to time in line with the requirement of the SEBI Guidelines or any other rules, regulations etc., which may be amended and applicable from time to time.

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ANNEXURE A

Record Preservation Schedule:

This Record Preservation Schedule sets forth an abbreviated schedule of key record-keeping holding periods and maintenance requirements. It is not intended to and does not provide a complete compilation of all statutory record-keeping holding periods or maintenance requirements. The information listed in the schedule below is intended as a guideline and may not contain all the records that the Company may be required to keep in the future.

I. Organisational Records	
Record Type	Preservation Period
A. Taxation Department	
i. Direct Taxes	
Employee Taxation related Files	8 Years
Assessment Related Files	Till time the matter is resolved
Tax Audit and Working Files	8 Years
TDS Monthly Files	8 Years
Files regarding matters under litigation	Till time the matter is resolved
i. Indirect Taxes	
Assessment, Audit and Returns related files including Statutory Forms	Till time the matter is resolved
Files for original purchase invoices for VAT, Excise and Service Tax	8 Years
Files regarding matters under litigation	Till time the matter is resolved
Refund and Rebate Claim	8 Years
Proof of Exports	8 Years
B. Accounts & Finance Department	
Salary/Wages/Bonus Sheets, Cash/Bank Vouchers, Bank Statements, Bills, Invoices, Journal Vouchers, MIS Records	8 Years
Other Documents maintained	Less than 8 years
Files regarding matters under litigation	Till time the matter is resolved
Cost Records	8 Years
C. Secretarial Department	
General, Board Meetings and Committees Meetings (Minutes)	Permanently
Register & Index of Members	Permanently
Register of Beneficial Owner	Permanently
Register of Charges	Permanently
Register of Contracts in which Directors are interested	Permanently
Register of Debenture holders	After redemption- 8 years
Register of Directors and Key Managerial Personnel	Permanently
Register of Directors' Shareholding.	8 years
Register of Foreign Members	Permanently
Register of Inter Corporate Loans & Investments.	8 years
Register of Investments not held by company in its own name	8 years
Register of Renewed & Duplicate Share Certificates	Permanently
Register of Securities bought back	8 years
Register of Security holders	8 years

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Register of loans, investments, guarantees and securities	Permanently
Incorporation Documents	Permanently
Register of Deposits	8 years
Register of Transfer & Transmission	8 years
Register of Employee Stock Option	8 years
Office copies of Notices, Agenda, Notes on Agenda and other related papers of the transferor company, as handed over to the transferee company, shall be preserved in good order in physical or electronic form for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board and permission of the Central Government, where applicable	8 years
Attendance Register	8 years
D. Legal Department	
Notices given / received	3 Years
Legal Disputes	Till time the matter is resolved and 1 more year
Summary of legal disputes	3 Years
Property Tax / Municipal Tax / Gram Panchayat Tax / Revenue Tax documents	3 Years
E. IT Department	
Vendor Invoice / Quotation	8 Years
Microsoft / SAP / Other licenses	Upto renewal period / period of license
New Email Id / SAP Id request	5 Years
SAP authorization / change / reversal request	5 Years
New Material code creation request	5 Years
Material loss / gain request	5 Years
Installation certificate	5 Years
Approved I.O.C. / P.O	5 Years
F. HR / Admin. Department	
PF & ESIC Challans and Returns, ER1, ER2, Labour Welfare Fund documents, Professional Tax Challans	5 Years
License under Shops and Establishment Act	Until the validity of license
Gratuity related data	3 Years
Bonus Register and Returns, Statutory online submissions	2 Years
Salary Sheets	3 Years
Leave Data, Loan Data, LTA Data, TADA Vouchers	As per need
Full and Final Data	1 year after employee leaving
Personal File data of employees	During currency of employment and thereafter for one year
