

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

1. INTRODUCTION

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) and related applicable provisions as mentioned in Companies Act, 2013. Archival Policy as referred to in Regulation 30 (8) of the Listing Regulations forms part of this Policy. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

2. PURPOSE OF THE POLICY

Regulation 9 of the Listing Regulations mandates that a 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 a preservation period of not less than eight years after completion of the relevant transactions.

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time. Accordingly, this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

3. POLICIES

A) PRESERVATION OF DOCUMENTS WITH SPECIFIC REFERENCE TO THE COMPANIES ACT, 2013 AND SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015

I. Documents whose preservation shall be permanent in nature:

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is listed in **Annexure-A**.

II. Documents with preservation period of not less than eight years:

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years shall be preserved accordingly. Details of documents with preservation period of not less than eight years is listed in **Annexure-B**.

III. Documents with preservation period other than those mentioned in (I & II) above:

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in I & II above shall be preserved accordingly.

4. PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

All the Employees on the permanent rolls of the Company are responsible for taking into account the potential

impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

5. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

6. STATUTORY REQUIREMENTS

If as per any other law of land, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

7. PERIODICAL REVIEW OF THE POLICY

The Board of Directors of the Company is authorised to periodically review the policy and make such changes as considered necessary from time to time.

**For SUNITA TOOLS LIMITED
(Formerly known as Sunita Tools Private Limited)**

SD/-

**Satish Kumar Pandey
Director
DIN: 00158327**

Annexure - A

S. No.	Documents / Record whose preservation shall be permanent in nature
1	Certificate of incorporation
2	Memorandum and Articles of Association
3	Certificate of Commencement of Business
4	Agreements made by the Company with Stock Exchanges, Depositories, etc.
5	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
6	Register and Index of Members, debenture-holders, if any or other security holders, if any
7	Register of Contracts, if any, as per Companies Act, 2013
8	Register of Charges, if any, as per Companies Act, 2013
9	Register of Investments, if any, as per Companies Act, 2013
10	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
11	Authorization / licenses, if any, obtained from any statutory authority
12	Policies of the Company framed under various regulations
13	Certificates obtained from various statutory authorities
14	Such other records as may be required under any law from time to time

For SUNITA TOOLS LIMITED
(Formerly known as Sunita Tools Private Limited)

SD/-

Satish Kumar Pandey
Director
DIN: 00158327

Annexure - B

S. No.	Documents / Record to be preserved for a minimum period of eight years
1	Instrument creating charge or modification (from the date of satisfaction of charge), if any, as per Companies Act, 2013
2	Annual Returns as per Companies Act, 2013
3	Register of Deposits, if any, as per Companies Act, 2013
4	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
5	Annual financial statements including: - Annual accounts - Directors report - Auditors report
6	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013
7	Income Tax Returns filed under Income Tax Act, 1961
8	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
9	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
10	Copy of newspaper advertisement or publications
11	Compliance Reports received from any statutory authority
12	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
13	Disclosure/Return filed under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015
14	Records, if any, relating to Court Cases/Civil Suits/Arbitration Cases.
15	Register of Inter Corporate Loans and Investments, if any, as per the Companies, 2013
16	Forms and Returns filed with MCA/RBI or with any other statutory Authority

**For SUNITA TOOLS LIMITED
(Formerly known as Sunita Tools Private Limited)**

SD/-

**Satish Kumar Pandey
Director
DIN: 00158327**