

# PRESERVATION OF DOCUMENTS And Archival policy

**Suyog Telematics Limited**  
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1<sup>st</sup> Floor, LBS Marg,  
Vikhroli West, Mumbai-400083

## 1. Legal Framework

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations). These Regulations come into force from December 1, 2015. The Regulations mandate listed entities to formulate a Policy for preservation and archiving of documents.

This Policy will be applicable to the Company wef 1<sup>st</sup> December, 2015.

## 2. Definitions

### a. “Board of Directors or Board”

Board of Directors or Board shall mean the Board of Directors of Suyog Telematics Limited, as constituted from time to time.

### b. “Company”

Company means “Suyog Telematics Limited”

### c. “Documents”

“Document” means any register, record or other document mandatorily required to be maintained by the Company as per the provisions of the Companies Act, 2013 and the rules made thereunder, the Securities and Exchange Board of India Act, 1992 and the regulations issued by the Securities and Exchange Board of India including any statutory modification and amendments or re-enactments thereof or under any other law for the time being in force whether maintained physically or electronically.

### d. “Listing Regulations”

Listing Regulations means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

## 3. Objective

The Company makes this Policy for Archival, Preservation and Disposal of Documents in compliance with the provisions of Companies Act, 2013 and Securities and Exchange

Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations) with the main objective to establish guidelines for the Company for preservation and archival of documents and orderly disposal of documents of the Company covered under this Policy.

#### **4. Applicability**

This policy shall apply to all the documents that are required to be maintained and preserved under the applicable provisions of the Act, the SEBI Act, the SEBI Regulations and any other acts, rules and regulation for the time being in force.

#### **5. Statement of Policy**

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- a. The documents of a permanent nature (listed in **Annexure 1**) 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. Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.
- b. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure-2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions 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 not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

In line with Suyog's Policy on Determination of Materiality of Events and as per the Regulations, the Company shall disclose all material events to the Stock Exchange and such disclosures shall be hosted on the website of the Company for a period of 5 (five) years and thereafter the same shall be archived for retrieval for a further period of 3 (three) years by storing the same on suitable media. Thereafter the said information, documents or records may be destroyed.

#### **6. Destruction of Documents**

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s).

Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

## **7. 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.

## **8. Amendment**

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.

## Annexure 1

### Documents whose preservation shall be permanent in nature

| S.No | Nature of Document(s)  |
|------|--|
| 1    | Incorporation Documents and Registration Certificates  |
| 2    | Licenses & Statutory Approvals   |
| 3    | Statutory Registers required under applicable laws   |
| 4    | Audited financial statements   |
| 5    | Minutes of General Meeting   |
| 6    | Minutes of Board Meeting   |
| 7    | Minutes of various Committee Meetings  |
| 8    | Material Agreements/Contracts  |
| 9    | 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 2

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

| S.No | Nature of Document(s)  |
|------|--|
| 1    | Books of Accounts  |
| 2    | Annual Return(s)   |
| 3    | Personnel Documents  |
| 4    | Insurance Policies/ Claims under various policies  |
| 5    | Correspondences with Departments/shareholders  |
| 6    | Non-Statutory Registers/Documents  |
| 7    | Films, Videos, CDs, DVDs, tapes etc.   |
| 8    | Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time. |