

**Policy for Preservation of Documents of Sadbhav Engineering Ltd.**

*(Adopted by the Board of Directors on November 04, 2015  
which will be effective from 1<sup>st</sup> December, 2015)*

**Title :**

This policy called "Policy on Preservation of Documents".

**Objective :**

This policy is framed pursuant to the provisions of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations").

**Definitions:**

"Documents" means Document as defined in sub-section (36) of Section 2 of the Companies Act, 2013

Documents includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

"Maintenance" means keeping registers and records, either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such registers and records.

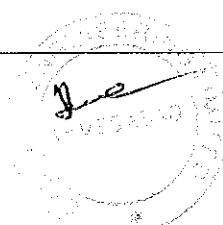
"Preservation" means to keep in good order; to prevent from being damaged or destroyed

"Register" means a register maintained under the Companies Act, 2013 or the SEBI Act.

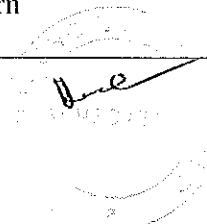
The Board of Directors (Board) has adopted the following policy with regard to preservation of documents :

**1. Documents/Registers under the Companies Act, 2013 shall be preserved as under :**

Sr. No.	Section	Form No.	Name of the Documents/Register	Preservation Period
01	46	-	Maintenance of share certificate forms and related books and documents.	All books shall be preserved for not less than thirty years and in case of disputed cases, shall be preserved permanently, and all certificates surrendered to a company shall immediately be defaced by stamping or printing the word "cancelled" in bold letters



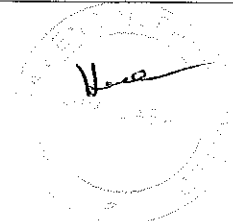
				and may be destroyed after the expiry of three years from the date on which they are surrendered.
02	46	SH-2	Register of renewed and duplicate share certificate	Permanently
03	54	SH-3	Register of sweat equity shares	Eight years
04	56	-	Register of transfer and transmission	Eight years
05	62	SH-6	Register of employee stock option	Eight years
06	68	SH-10	Register of shares or other securities brought back	Eight years
07	76		Register of deposits	Eight years
08	81	CHG-7	Register of charges	The register of charges shall be preserved permanently and the instrument creating a charge or modification thereon shall be preserved for a period of eight years from the date of satisfaction of charge by the company.
09	88	MGT-1	Register of members	Permanently
10	88	MGT-2	Register of debenture holders or any other security holders	Eight years from the date of redemption of debentures or securities.
11	88	MGT-3	Foreign register of members, debenture holders, other security holders or beneficial owners residing outside India	The foreign register of members shall be preserved permanently, unless it is discontinued and all the entries are transferred to any other foreign register or to the principal register. Foreign register of debenture holders or any other security holders shall be preserved for a period of eight years from the date of redemption of such debentures or securities.
12	92		Annual Return	Eight years from the date of filing with the Registrar.



13	105		Proxies and Proxy Register	Eight years
14	118		Minutes of the General Meeting, Board Meeting and Committee Meeting	Permanently
15	123		Dividend Register & Records	Eight years
16	128		Books of Accounts etc.	Eight years
17	170		Register of directors and key managerial personnel and their shareholding	Permanently
18	184	MBP-1	Disclosure of Interest by Board of Directors	Eight years
19	186	MBP-2	Loan, Investment and Guarantee by a company	Permanently
20	187	MBP-3	Investments made by a company not held in its own name	Permanently
21	189	MBP-4	Contracts or arrangements in which directors are interested	Permanently
22	397- Rule (7)	-	Documents duly stamped in original relating to incorporation and matter incidental thereto, changes in any clause of Memorandum and Articles of Association	Permanently

**2. Other Registers and Records maintained under Companies Act, 2013 shall be preserved as under :**

Sr. No.	Name of the Documents/Register	Preservation Period
1	Register of Directors' Attendance	Eight years
2	Register of Member's Attendance	Eight years
3	Ballot Papers and Scrutinizer Report	Eight years
4	Register & Records of Postal Ballot	Eight years
5	Documents/forms filed with Registrar of Companies.	Eight years
6	Annual Reports	Eight years
7	Declarations/Certificates received under Code of Conduct	Eight years
8	Register of Inspection	Eight years
9	Financial Documents in respect of Borrowings	Eight years from re-payment
10	Contract, Agreements and Sub Contracts related to Work	Eight years from completion of work



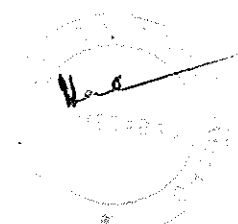
**3 Disclosures made/received under SEBI Regulations shall be preserved as under :**

Sr. No.	Regulation	Name of the Documents/Records	Preservation Period
1	Regulation 6 under SEBI (Prohibition of Insider Trading) Regulations, 2015	Disclosures made under this regulation	Five years
2	Regulation 30 under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	All events/informations which has been disclosed to stock exchange(s)	Disclosures of such events/informations shall be hosted on the website for Five years and thereafter as per the archival policy of the Company
3	Regulation 40(3) under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	proper verifiable dated records of all correspondence with the investor shall be maintained by the Company	Five years
4	Securities and Exchange Board of India (Substantial Acquisition of Shares And Takeovers) Regulations, 2011	Disclosures made under this Regulations	Five years

**4 Preservation of Corporate Polices :**

The Company shall preserve permanently various policies framed under Companies Act, 2013 and SEBI regulations from time to time viz.:

1. Code of Conduct for Board of Directors and Senior Management
2. Corporate Social Responsibility Policy
3. Policy for determining Material Subsidiary
4. Related Party Transaction Policy
5. Risk Management Policy
6. Remuneration Policy
7. Whistle blower Policy
8. Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders
- 8 Code of practices and procedures for fair disclosure of unpublished price sensitive information
- 9 Policy on Materiality of Events
- 10 Policy for preservation of Documents
- 11 Sexual Harassment Policy



**5 Manner of preservation of documents :**

The Company shall keep /preserve documents either in physical or electronic mode.

**Amendments:**

The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy according to subsequent modification(s)/amendment(s) to Regulations.

