

SHARDUL SECURITIES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS (Including Archival Policy)

I. Preface

The Board of Directors (the “Board”) of SHARDUL SECURITIES LIMITED (the “Company”) has approved the following Policy (the “Policy”) of the Company for preservation of Documents / Records maintained by the Company either in Physical Mode or Electronic Mode\ (hereinafter referred to as the “Documents”).

This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Listing Regulations”).

This policy may be reviewed by the Board of Directors and amendments made, to comply with any requirements under any statute or regulation, from time to time and shall have prospective.

II. Documents

Documents to be retained permanently:

- All documents filed with Ministry of Corporate Affairs.
- All documents filed with SEBI/ BSE/RBI
- All documents filed with Tax Authorities in Income Tax, Service Tax, VAT & Similar Tax Authorities.
- All permits, licenses, authorization from any statutory authorities.
- Audited Accounts.
- Minutes books of Board, General Meetings and Committee Meetings
- Statutory Registers
- Any other document required to be preserved permanently under any law / statute.

Documents to be retained for a minimum period of 8 years:

- Bank, cash vouchers, payment vouchers, warrants.
- Bank statements
- Purchase bills.
- Sales invoices debit/ credit notes, etc.
- Accounting records.

- Board, Committee and General meeting Agenda and supporting documents
- Attendance Registers
- Any other documents required to be preserved for 8 years under any law/ statute.

The Company being NBFCs shall maintain for at least ten years from the date of cessation of transaction between the Company and the client, all necessary records of transactions

Other documents may be stored and preserved in physical form/ electronic form, after the completion of the relevant transactions, for such period as may be required, in each case.

III. Electronic documents including email retention and back up:

- All email from internal and external sources to be deleted after they cease to be of current use.
- Employees should keep emails related to current business issues.
- Employee will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the respective Head of Department.
- Employees will take care not to send confidential information to outsiders.

IV. WEB PAGE FILES:

- All such events/ information hosted on the Company's website shall be retained for a period for 5 years as specified in Listing Regulations, 2015.
- After the initial period of 5 years, documents/ information (except documents of permanent nature) shall be archived by the I.T. department for a further period of 3 years.
- Documents of permanent nature, uploaded on the Company's website, shall be archived by the I.T. Department.

V. RESPONSIBILITY:

The responsibility for preservation of the documents will be on the concerned department heads. Head – IT will be responsible for all the documents preserved in electronic made.

VI. General

Any change in the governing laws affecting the change in period of preservation of documents & records shall prevail over this Policy.
