



POLICY ON PRESERVATION OF DOCUMENTS AND

ARCHIVAL POLICY

OF

SARLA PERFORMANCE FIBERS LIMITED

LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

The Board of Directors of Sarla Performance Fibers Limited (“the Company”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

PURPOSE OF THE POLICY

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company’s approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company’s commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents.

This policy seeks to ensure that the Company’s business is adequately documented and that are then managed in accordance with best practice. Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

EFFECTIVE DATE

This Policy is effective from 2nd December 2015.

DEFINITIONS

“**Preservation**” is maintenance of documents, files and documents in usable form.

“**Documents**” means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

“**Document keeping**” means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

“**Company**” means Sarla Performance Fibers Limited.

“**Board of Directors**” or “**Board**” means the Board of Directors of Sarla Performance Fibers Limited, as constituted from time to time.

“**Policy**” means policy on Preservation of documents.

“**Storage Options**” means “Board of Directors” or “Board”.

“**Online storage**” Documents are kept on a server or hard drive and are immediately available for use over a network. This option is best for documents that must be accessed frequently.

“**Near-line storage**” Documents are stored on media such as optical disks in jukeboxes or tapes in automated libraries which are attached to a network. Their retrieval is slower than compared to the online storage, it is appropriate for documents that are occasionally accessed.

“**Offline storage**” Documents are stored on removable media and must be manually retrieved. This option provides the slowest access and should be used for documents that are only rarely needed.

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

OBJECTIVE

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.

GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

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 Board of Directors. 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.

COMMUNICATION AND DISSEMINATION OF THE POLICY

For all existing and new Employees as well as Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company. Further, all press releases and publicly filed documents shall be maintained in perpetuity. All events and press releases filed with the stock exchanges shall be maintained for a period of not less than five (5) years on the website of the company.

Similarly, if an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Secretarial/ Legal Department advises otherwise. The policy should be reviewed periodically by the senior management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The senior management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.

AMENDMENTS

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.	Certificate of Incorporation
2.	Certificate of change of name (if any)
3.	Memorandum and Articles of Association as amended from time to time
4.	Licenses & Statutory Approvals
5.	Statutory Registers required under applicable laws
6.	Audited financial statements
7.	Minutes of General Meeting
8.	Minutes of Board Meeting
9.	Minutes of various Committee Meetings
10.	Material Agreements/Contracts
11.	Orders issued by Courts/Statutory bodies
12.	Investment Documents/proofs including certificates etc.
13.	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.