

# SPL Industries Limited

CIN: L74899DL1991PLC062744

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## POLICY ON PRESERVATION OF DOCUMENTS

### 1. Introduction

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”) requires every Listed Company to formulate and put in place a Policy for Preservation of Documents (“Policy”).

In compliance of the above Regulations, the Board of Directors of SPL Industries Limited (“Company”) has adopted the following policy.

### 2. Purpose

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements.

### 3. Scope of the Policy

For the purpose of achieving the above objectives, the Records covered as per this Policy have been divided into two sections, i.e. the Records those will be preserved permanently

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by the Company and those that will be preserved for the period of at least 8 years and not permanently.

This Policy applies to the Records maintained by the Company in any format or medium.

## 4. Roles and Responsibilities

The respective Business / Departmental Heads of the Company shall be responsible for maintenance, preservation and destruction of documents in respect of the areas of operations falling under their charge.

All staff and management of the Company shall assist in implementing this Policy as appropriate to their roles and responsibilities.

## 5. Preservation of Documents

Based on the requirement and for the purpose of effective management, the period for which the Records of the Company shall be maintained have been classified into two categories:

- i. Documents of a permanent nature which shall be maintained and preserved permanently by the Company subject to modifications, amendments, additions, deletions or any changes made therein from time to time. (Listed in Annexure-1)
- ii. Documents to be preserved by the Company for not less than 8 years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. (Listed in Annexure-2)

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The Company may preserve the documents as specified above, in electronic mode also.

The Records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation by which they are governed.

## 6. Destruction of Documents

After the expiry of the statutory retention period, the preserved documents may be destroyed in any mode under oral or written instructions by the respective Business / Department Heads.

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.

## 8. Communication of this Policy

This Policy shall also be posted on the web-site of the Company.

## 9. 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.

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## 10. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. Further the annexures to this Policy can be amended without the approval of the Board of Director, in case change is necessitated by any applicable law(s).

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Annexure-I

**Documents whose preservation shall be permanent in nature-**

<b>S. No.</b>	<b>Nature of Document(s)</b>
1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Minutes of General / Board / Committee Meetings
5.	Material Agreements/Contracts
6.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

**Documents whose preservation shall be not less than eight years after completion of the relevant transactions**

<b>S. No.</b>	<b>Nature of Document(s)</b>
1.	Books of Accounts
2.	Annual Returns
3.	Personnel Records
4.	Insurance Policies / claims under various policies
5.	Non-Statutory Registers / Documents
6.	Audited Financial Statements
7.	Orders issued by Courts/Statutory Bodies