

Smruthi Organics Ltd

CIN:L24119PN1989PLC052562

POLICY ON PRESERVATION OF DOCUMENTS

PREAMBLE:

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 Smruthi Organics Limited ("the Company") has adopted a policy for "Preservation of Documents" to comply with the requirements of Regulation 9 of the Listing Regulations.

The Regulation requires the Board of Directors of a Company to frame a Policy for Preservation of Documents classifying them into categories:

- a) Documents whose preservation of documents shall be permanent in nature;
- b) Documents with preservation period of not less than eight years after completion of the relevant transactions;

APPLICABILITY:

This Policy is applicable to all the Documents maintained in physical and electronic mode by the Company. The documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

DOCUMENTS:

For the purpose of this Policy the term "Documents" shall mean statutory records, registers, return, forms etc. required to be maintained and preserved by the Company in physical or electronic form under the Companies Act, 1956 /Companies Act, 2003, Securities and Exchange Board of India Act, 1992, Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1996.

A) Documents to be preserved permanently:

- 1) Registration Certificate
- 2) Licenses and Statutory Approvals
- 3) Statutory Registers required under applicable laws
- 4) Audited financial statements
- 5) Minutes of General Meetings
- 6) Minutes of Board Meetings
- 7) Minutes of Various Committee Meetings
- 8) Material Agreements/ Contracts
- 9) Orders issued by Courts/ Statutory bodies
- 10) Investment documents/ Proof 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.

B) Documents shall be preserved and maintained for a period of not less than eight years after completion of the relevant transactions:

- 1) Annual Returns
- 2) Books of Account
- 3) Personnel Documents
- 4) Insurance Policies/ Claim under various policies
- 5) Correspondence with Departments/ shareholders
- 6) Non Statutory Registers/ Documents
- 7) Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

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

AUTHORITY FOR APPROVAL OF POLICY

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted *via* the Regulations.

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.