

# **SNS PROPERTIES AND LEASING LIMITED**

## **POLICY FOR PRESERVATION OF DOCUMENTS**

### **1. Preamble:**

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) requires every listed company to have a policy on Preservation of Documents maintained by the Company.

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

- i. Documents whose preservation shall be permanent; and
- ii. Documents to be preserved for not less than eight years after completion of the relevant transaction.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that documents whether in physical or electronic mode, forms an important and integral part of the Company’s records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Accordingly, the Board of Directors of SNS Properties and Leasing Limited (the “Company”) has adopted this Policy for preservation of documents.

### **2. Applicability:**

This Policy is applicable to all Documents maintained in physical/ 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.

### **3. Documents:**

For the purpose of this Policy the term “Documents” shall mean statutory records, registers, returns, forms etc. required to be maintained and preserved by the Company in physical or electronic form in terms of securities laws defined under Regulation 2(1) (zf) and other laws & statutes applicable to the Company.

### **4. Archival Policy**

Any disclosure of events or information which has been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and after completion of 5 years, the same shall be archived by the Company for a further period of two years. Thereafter such events or information may cease to be displayed on the website of the Company.

## **5. Disposal & Destruction of Records**

Records should not be kept longer than is necessary and should be disposed off at the right time as unnecessary retention of records consumes time, space and equipment. The documents referred to in Annexure A shall be preserved permanently whereas the documents enumerated in Annexure B shall be preserved for a period of 8 years and may be disposed off after the expiry of periods of their preservation, after the approval of the Managing Director of the Company.

## **6. Review of Policy**

Any change / amendments in applicable statutes with regard to maintenance and preservation of documents and records shall be deemed to be covered in this policy without any review.

A copy of this policy shall also be disclosed on the website of the Company.

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## **Annexure- A**

### **Documents to be preserved permanently:**

- Incorporation Documents.
- Memorandum and Articles of Association as amended from time to time.
- Register of Contracts or Arrangements in which directors are interested.
- Register of loan, guarantee, security and acquisition made by the Company.
- Register and Index of Members.
- Share certificate forms and related books and documents (*Disputed cases*)
- Register of Renewed and Duplicate Share Certificates.
- Register of Charges.
- Minutes of the proceedings of Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots.
- Resolutions passed by Circulation.
- Audited Financial Statements and Auditors Reports

## **Annexure B**

**Following documents shall be preserved and maintained for a period of 8 years from the date of its event, unless specified under any other Act or rules, for a longer duration:**

**A) Under the Companies Act 1956 / Companies Act, 2013:**

- Office Copies of Notices, Agenda and Notes to agenda and other related papers of the Board and Committees of the Board.
- Office Copies of Notices of General Meetings and Postal Ballots. Scrutinizer's Report on E-Voting, Poll and Postal Ballot.
- Instrument creating Charge or modification thereon.
- Register and Index of Debenture-holders or any other security holder.
- Annual Returns together with its Annexure.
- All notices for disclosure of concern/ interest received from Directors of the Company.
- Attendance Register of Board & Committee Meetings.
- Books of Accounts including vouchers and bills.
- Register of Transfer and Transmission of shares / Debentures and other securities.
- Dividend reconciliation statement till the time the dividend is transferred to Investor Education Protection Fund.
- Register of Deposits.

**B) Documents filed with Stock Exchanges under SEBI Regulations**

- All disclosures and intimations filed under:
  - i) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
  - ii) SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.
  - iii) SEBI (Prohibition of Insider Trading) Regulations, 2015.
  - iv) SEBI (Issue of Capital and Disclosure Requirements) Regulations 2018.