



SUNDARAM MULTI PAP LIMITED

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POLICY ON PRESERVATION OF DOCUMENTS

SCOPE

A policy on preservation of Documents (defined below) would ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. Regulation 9 of the Securities Exchange Board of India (“SEBI”) (Listing Obligation and Disclosure Requirements) Regulations, 2015 requires the Company to frame a policy on preservation of documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

The Board of Directors of Sundaram Multi Pap Limited (the “Company”) is obliged to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulation

The policy is applicable to the Company from December 1, 2015

DEFINITION

1. “Applicable Law” means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the Documents has been prescribed.

2. “Archive/archiving”

Archive / archiving is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit, and preserving the historical memory and proof of an activity.

3. “Authorized Person”

Authorized Person means any person duly authorized by the Board.

4. “Board”

Board in relation to the Company, means the collective body of the Directors of the Company.



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5. "Company"

Company means "Sundaram Multi Pap Limited"

6. "Documents"

Documents means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.

7. "Listing Regulations"

Listing Regulations means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")
The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The company shall maintain and preserve documents as specified hereunder:

Category (A):

The documents of permanent nature (listed in **Annexure-1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

Category (B):

The documents of the company to be maintained and preserved for 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 year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

For the purpose of this policy, document may include the following:

1. 'Books and papers' as defined in clause 12 of section 2 of the Companies Act, 2013;
2. 'Books of accounts' as defined in clause 13 of section 2 of the Companies Act, 2013;
3. 'Documents' as defined in clause 36 of section 2 of the Companies Act, 2013;
4. 'Register of company' as defined in clause 74 of section 2 of the Companies Act, 2013.



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Further, the company may deeming fit and possible from time to time maintain above mentioned documents in electronic form to the extent possible.

PRESERVATION PRINCIPLES

1. The Company shall disclose on its website all such events and information which have been disclosed to the Stock Exchanges under Regulation 30 of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a period of five years from the date of disclosure to the Stock Exchanges.
2. After five years, such disclosures shall be removed from the Company's website and preserved in a secured server of the Company. Such disclosures shall be preserved in a logical manner viz. as per nature/date of the disclosure, etc. to facilitate easy retrieval as and when required. The disclosures shall be preserved in a non-editable format which do not require permanent preservation but require years of preservation as prescribed under Applicable Law on the server of the Company.
3. Physical preservations shall be ensured in proper store / record rooms, access to which shall be allowed to only persons authorized.

DESTRUCTION OF DOCUMENTS

1. Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents.
2. The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved.

The categories of Documents may be destroyed as normal administrative practice are listed in Annexure II

3. A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.
4. The entries in the register shall be authenticated by the Authorized Person.



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The format of the register has to be in accordance with Annexure III.

CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED

1. The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
2. This will be done after obtaining prior approval of the Board.

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

COMMUNICATION

Copy of this policy duly approved shall be placed before the Board and circulated among all the Director of the Company. This policy as amended from time to time shall be made available at the website of the Company.



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Annexure 1:

Documents which shall be preserved permanently

Sr. No.	Nature of Document(s)
1.	All documents and information originally filed with ROC for Incorporation of Company
2.	Memorandum of Association and Article of Association of the Company
3.	Register of Members
4.	Index of Members
5.	Register of Charges
6.	Minutes of General Meetings
7.	Minutes of Board Meetings
8.	Minutes of various Committee Meetings

Annexure 2:

Documents which shall be preserved for a period of 8 years after completion of relevant transaction

Sr. No.	Nature of Document(s)
1.	Book of Accounts
2.	Annual Return(s) prepared pursuant to Companies Act
3.	All notices pertaining to disclosure of interest of Directors
4.	Register of Debenture holder
5.	Index of Debenture holders
6.	Tax related records and documents
7.	Any other documents as may be required to maintain in terms of applicable law(s) maintained and preserved from time to time

The following categories of Documents may be destroyed as normal administrative practice:

Sr. No.	Nature of Document(s)
1.	Catalogues
2.	Draft of report, correspondence, speeches, notes, spread sheets, etc
3.	Copies of press cuttings or press statements
4.	Copies of Maps, Plans, Chart, Advertising material
5.	Routine statistical and progress report compiled and duplicated in other report



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Annexure 3:

The format of the register of Documents disposed / destroyed

Particulars Of Document Along with Provision Of Applicable Law	Date And Mode Of Destruction	Initials Of The Authorized Person