



THE SCOTTISH ASSAM (INDIA) LTD

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POLICY FOR PRESERVATION OF DOCUMENTS

Introduction:

The Board of Directors of the Scottish Assam (India) Limited has adopted this policy for preservation of documents (herein after referred to as 'the Policy') in compliance with the requirement of Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

The policy sets the standards for systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business.

Classification of Documents to be preserved/Retained:

The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:

- a. Documents whose preservation shall be permanent in nature.
- b. Other documents whose preservation period shall not be less than eight years after completion of the relevant financial year of transactions.

The Company may keep documents specified in clauses (a) and (b) in electronic mode.

An indicative list of documents for the above categories are given in the **Annexure-I**.

Objectives:

The objective of this policy is to provide a framework for preservation of documents of the Company. This preservation shall be permanent in nature. However for some other documents preservation period would not be less than 8 years after completion of the relevant transaction.

Custody of the documents:

Subject to the Applicable Law, the custody of Documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such person shall hand over all the relevant documents, lock and key, access control or password or Company Disc, other storage devices or such other documents and devices in his possession under the policy to the Company Secretary/Director or to such other person as the Board may authorize for the time being.

Destruction of Documents:

The destruction of any documents shall be reviewed by the respective department and prior approval from the Board of Directors/any Committee delegated by the Board shall be obtained for this purpose. Details of all documents destroyed shall be entered in the register maintained for this purpose with the Authorized Person. The format of the register has to be in accordance with **Annexure-II**.



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Premature destruction of records is expressly prohibited, and if intentional, may result in disciplinary action, up to and including termination of employment and possible civil or criminal liability.

Authority for the approval of the Policy:

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

Amendments:

The Board of Directors is authorized to make alterations to this policy as considered appropriate from time to time, however such alterations shall not be inconsistent with the provisions of Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulations, 2015.



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Annexure –I

Permanent Preservation

1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited Financial Statements
5.	Audit Reports
6.	Investment records
7.	Tax records
8.	Property records including purchase and sale deeds, licenses, copyrights, patents & trademarks
9.	Minutes Book of Board and all committees
10.	Minutes Book of General Meeting
11.	Annual Return
12.	Material Agreements/Contracts
13.	Orders Issued by Court / Statutory Bodies
14.	Personal files of individual employees
15.	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 period is atleast eight years after the completion of the relevant Transaction /period:

1.	Books of accounts together with relevant vouchers
2.	Insurance Policies/ Claims
3.	Payroll records
4.	Correspondence with departments/ shareholders
5.	Office copies of Notices, Agenda, Notes on Agenda and other related papers of Board and its Committee meetings.
6.	Office copies of Notices, Scrutinizers Report and related papers of General Meeting and Postal Ballot.
7.	Attendance Registers for meeting of the Board and its committees
8.	Disclosure of interest by Directors
9.	Instrument creating a charge or modification
10.	Documents submitted or disclosures made to the stock exchanges.
11.	Documents filed with Registrar of Companies (other than the documents which are required to be maintained permanently)



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Annexure –II

Format of the register of documents disposed/destroyed

Particulars of Document along with provision of applicable law	Date and mode of destruction	Initials of Authorized Person