



Sundram Fasteners Limited

SUNDRAM FASTENERS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS / ARCHIVAL OF DOCUMENTS

[Pursuant to Regulation (9) and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

[As approved by the Board of Directors on May 20, 2016]



1. Preamble

Regulations 9 and 30(8) of Chapter III of the (SEBI) (Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR Regulations) mandated framing of a policy by all listed companies for preservation / archival of documents.

Sundram Fasteners Limited (hereinafter referred to as 'the Company' or 'SFL'), has formulated and notified this Policy for preservation / archival of documents in compliance with the LODR Regulations. The Board of Directors may review and amend this policy from time to time.

2. Purpose and Scope

The main purpose is to present a policy statement for the Company regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and in accordance with the provisions of LODR Regulations.

This policy is intended to define the following:-

- a. SFL's preservation of documents
- b. To provide guidance to the employees of SFL.
- c. To frame the guidelines for fundamental accountability of the Company to retain and preserve its documents as the basis for communication with a range of external stakeholders.

This policy is framed for the following purposes:-

- a. systematic identification, categorization, maintenance, review, retention and destruction of documents received or created during the course of business.
- b. To specify guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

3. Definition

3.1. 'Archive' means a place containing records, documents, or other materials of Company's historical importance are preserved.

3.2. 'Preservation of Documents' classified under Regulation 9 of the LODR Regulations, as follows:-

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

3.3. 'Unit' means factories located at various locations at present and at such locations, as may be established, from time to time.

Words and expressions used in this policy shall have the same meanings respectively assigned to them in the Companies Act, 2013 and the LODR Regulations.

4. Classification of Documents to be preserved / retained

The Board of Directors have classified the following documents to be retained and preserved for posterity.

- a. Documents that need to be preserved / retained permanently
- b. Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR Regulations



- c. Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case.
- d. Documents like internal budgets etc., which may be retained for less than 8 years.

5. Responsibility for Preservation of Documents

All the Employees in the rolls of the Company are responsible for taking into account the potential impact on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area of work.

However, the ultimate responsibility for determining whether to retain or dispose or archive of specific documents rests with the concerned Departmental / Unit Heads.

The Departmental / Unit Head shall be responsible only to their respective Department / Unit. For instance, the Corporate Finance Head shall be responsible only for documents relating to the Corporate Finance, Secretarial, Legal, Internal Audit and the Unit Finance Head shall be responsible only for their respective Unit.

6. Preservation Principles

It is only through preservation that continued availability access to documents can be maintained. The following principles shall be adhered:-

- Documents shall be preserved in their original format, wherever possible, respecting the physical integrity and authenticity of the original documents.
- Active conservation mechanism at regular intervals be employed as and when appropriate, to prevent further deterioration / damage to document(s).
- Appropriate conservative measures shall be taken into account, considering the need, significance, value and usage of the document in question.
- The employees of SFL shall be made aware at regular intervals of the paramount importance of preservation of documents, and shall be trained in safe handling of documents.
- The employees shall be trained to learn about the methods to sustain 5S practices, apply methods learnt to overcome challenges in implementing 5S, develop 5S standards for their work area, identify the areas of improvement and implementation and apply the methods for sustaining 5S practices.

7. Periodical Review of the Policy by the Board of Directors

The Policy should be flexible easy to understand and comply with by all levels of employees. The policy should be reviewed on an annual basis, by the Board of Directors of SFL and amendments effected to, as and when mandated. The Board of Directors of the Company may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.

8. Administration

The responsibility to maintain and retain the physical records as per Standard Operating Procedure (SOP) defining the nature of records, their retention period and manner of disposal of records rests with the concerned Departmental / Unit Heads.



9. Suspension of Record Disposal in the event of Litigation or Claims

In case, the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning SFL or commencement of any litigation against the Company, such employee shall inform the Departmental / Unit Heads and disposal of further documents pursuant to this policy, if any, shall be suspended until such time, as the Departmental / Unit Heads of the Company may advise or determine otherwise.

The Departmental / Unit Heads in such case shall inform all the employees by e-mail, the need to retain the documents and suspension of disposal of the same.

10. Storage and Archival of Records

A record that is no longer required in which it originated or was received, and that has permanent legal, institutional, or historical value, to be archived.

Hard copies or scanned copies of documentation beyond its operational date may be kept onsite for reference purposes and the Information Technology department of the Company shall have a back-up of the electronic data at an appropriate safe location.

Copies of all material disclosures made to the stock exchanges under Regulation 30 of the LODR Regulations shall be hosted on the website of the Company for a minimum period of 5 years. After a period of 5 years from the date of filing the records or documents with the stock exchanges, the copies of such records or documents shall be archived from the website of the Company.

11. Document destruction process

It must be ensured that all copies of information, which are no longer required to be retained, are permanently and completely destroyed. The information must be removed from all electronic media devices.

Some records are scheduled for destruction immediately after active use; others are scheduled for destruction after the semi-active phase of retention.

Physical destruction for paper-based records is defined as confidential shredding.

Physical destruction for electronic documents and e-mail or physical destruction of stored media is defined as deleting the documents from active computer system repositories.

Drafts of documents need not be retained, unless the concerned Departmental / Unit Head advise otherwise.

12. Disposal of Documents

The documents after the said period of 8 years (whose preservation shall not be permanent in nature) may be disposed of, in the presence of the concerned Departmental / Unit Heads. The disposal of significant documents should be documented by the relevant Departmental / Unit Heads by keeping a record of the document disposed of, the date and method of disposal, and who authorised disposal.

13. Register of Documents destroyed

The Company shall maintain a register, wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the respective Functional Heads at Corporate and at each Units of the Company at various locations and shall send an annual report to the Corporate – Secretarial on or before 30th September every year, to be presented before the Board for their information and review.



14. **Amendment**

This policy may be amended by the Board at any time either suo-moto and / or pursuant to amendments to the LODR Regulations or such other law, rules, regulations, guidelines as may be applicable. If there is any amendment to the policy, this policy will be deemed to have been amended and such amendment will take effect from date of the approval of such amendment.

This policy has been adopted and approved by the Board of Directors on May 20, 2016.
