
SUNDRAM FASTENERS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS / ARCHIVAL OF DOCUMENTS

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

[As amended and approved by the Board of Directors on November 3, 2023]

1. Preamble

Sundram Fasteners Limited (the "Company") is guided by various legal, regulatory and statutory requirements as applicable from time to time, with regard to record keeping, record retention and destruction of obsolete records. The records are to be maintained based on the type and kind of records in a manner so as to comply with all applicable Acts, Rules, Regulations and Guidelines, and the retention periods indicated therein.

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

This document *supersedes* the existing Policy on preservation of the Documents / Archival of Documents.

This policy shall be applicable from November 3, 2023 and shall remain valid until such time, it is modified/amended/alterd by the Board.

2. Purpose and Scope

- This Policy provides a framework for ensuring that official records and documents, both physical and electronic, including emails, are adequately maintained and protected. The Policy also deals with the retrieval process and disposal/destruction of obsolete records and how the documents should be accessed and retrieved when they are needed.
- This Policy covers records retained at the Company's own location and/or at the locations of the Registrars and Share Transfer Agents appointed by the Company.
- Systematic identification, categorization, maintenance, review, retention and destruction of documents received or created during the course of business.

3. Definitions

- 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. **Key features**

- All records whether held in the physical form or in the electronic media will be kept in good condition, stored safely and in an orderly manner to facilitate ease of retrieval.
- Managing physical records involves identification, labelling, filing, storing, archiving and disposal. Managing electronic or digital records involves storing, safeguarding, providing back up and ensuring alternate locations for easy retrieval.
- As required by the Regulations, this document outlines the policy in respect of maintenance of records, specifically in relation to record retention and location. Some of the key features of the Policy are Record maintenance, Record keeping, Record retention, Record media and Record location.

5. **Record maintenance**

The responsibility of maintaining the records would be with the concerned Departments within the Company. Records will be maintained for the periods stipulated in the concerned legislation, after which they may be destroyed in the manner provided in this Policy. If there is no statutory period prescribed for maintenance, such record shall be preserved for eight (8) years from the date of its creation.

a. Physical records:

- Each of the Departments is responsible for keeping track of the location and contents of all physical records for which they are responsible. The respective Departments will ensure that physical records are kept in good condition, stored safely in an orderly manner and correctly labelled to facilitate ease of retrieval. They will also ensure confidentiality of the records and ensure that no unauthorized person gets access to the records.
- Records and Registers relating to Members, shares and other securities of the Company, including Members' Register, shall be maintained by the Company's Registrars and Share Transfer Agents appointed by the Company. The Company may also engage third-party custodians to retain any of the documents subject to this Policy, provided that the Department responsible for such records will exercise supervision over such third-party custodian and will continue to have overall responsibility for the records maintained with the third-party custodian.

b. Electronic records:

- Each of the Departments is responsible for keeping track of all electronic records for which they are responsible. The respective Departments will ensure that electronic records are stored safely on computers and password protected for confidentiality, and backed up on servers or external hard drives or in any other appropriate manner for easy retrieval. They will also ensure confidentiality of the records and ensure that no unauthorized person gets access to the records.
- The IT Department shall be responsible for formulating processes for proper maintenance of electronic records, password policy for maintaining their confidentiality, processes for proper back-up of the records and will also ensure remote location back-up servers.

6. **Disposal of records**

After the period specified in the concerned statute is over, the documents/records may be destroyed as provided hereunder:

a. Physical records:

After completion of the retention period, the records maintained in physical form may be destroyed, unless required to be preserved for any purpose, such as on-going

litigation or regulatory directive. The concerned Department Head will authorize destruction of the records and the same will be destroyed in the presence of a person authorized for the purpose, who shall ensure their destruction in accordance with practices that preserve the security of the information contained in them. The Department will maintain a list of the records so destroyed, which shall be signed by the person authorized as above and such destruction of records shall be intimated to Company Secretary and the Compliance Officer within three working days (from the date of destruction of records) as per the format prescribed vide **Annexure**.

b. *Electronic records*

After completion of the retention period, the records maintained in electronic form may be deleted, unless required to be retained for any purpose, such as ongoing litigation or regulatory directive. The concerned Department Head will authorize the deletion of the records. The Department will maintain a list of the records so deleted, which shall be signed by the person authorized for the purpose. b) The IT Department shall maintain a procedure to delete records no longer required to be retained, from back-up servers and for appropriately purging emails no longer required to be maintained.

c. *Emails*

Disposal / deletion of all retained mail will be decided based on business requirements, policies and other statutory requirements from time to time.

d. *Regulatory provisions*

Where the law provides for any specific procedure for destruction of any records, it shall be ensured that such procedure is followed.

7. Review of Policy

This Policy has been adopted by the Board of Directors of the Company and the Board may review and amend the Policy, as and when required to do so due to regulatory changes or under any other circumstances necessitating revision to the Policy.

Annexure

Register of Documents destroyed

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| Sundram Fasteners Limited | |
| a. Department / Unit: | |
| b. Location: | |
| c. Details of documents to be destroyed: | |
| 1. | |
| 2. | |
| 3. | |
| d. Date of intimation to Corporate Office: | |
| e. Date of consent given: | |
| f. Date of destruction: | |
| g. Mode of destruction: | |
| Functional Head – Corporate / Functional Head – Unit / Unit – Head - Approval | |
| Place: | |
| Date: | |