

## **POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS IN ITS WEBSITE**

### **1. Purpose and Scope**

The purpose of this documents is to present a policy statement for Siyaram Silk Mills Limited (Siyaram) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR").

The policy is intended to define Siyaram's preservation of documents responsibilities and to provide guidance to the executives and staff working in Siyaram in making decisions and undertaking other activities that may have an impact future reference of the document. It also frames the guidelines for fundamental accountability of Siyaram to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain 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.

This policy has been adopted and approved by the Board of Directors at its meeting held on 22<sup>nd</sup> December, 2015.

### **2. Statutory Mandate**

The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources.

### **3. Classification of Documents to be preserved / retained**

The management of the Company has classified the following documents to be retained and preserved for posterity

Corporate office: B - 5, Trade World, Kamala City, Senapati Bapat Marg, Lower Parel, Mumbai - 400013 (India)

Phone: 3040 0500/6833 0500

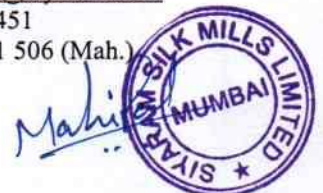
Fax: 3040 0599

Email: [sharedept@siyaram.com](mailto:sharedept@siyaram.com)

Internet: [www.siyaram.com](http://www.siyaram.com)

CIN: L17116MH1978PLC020451

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- Documents that need to be preserved / retained permanently - Doc 1
- Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR - Doc 2
- Documents to be preserved electronically and archived when necessary - Doc 3
- Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case - Doc 4
- Emails of all employees for a period of 3 years - Doc 5
- Documents like budget papers, bank guarantees etc., which may be retained for less than 8 years - Doc 6.

#### **4. Principle of Responsibility of Employees for Preservation of Documents**

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

#### **5. Administration**

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is as given in the annexure. The policy should be reviewed periodically by the Top Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The Top management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

#### **6. 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 Siyaram or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top Management in such case shall inform the concerned employee by mail of the need to retain the documents and suspension of disposal of the same.



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## 7. Disaster Preparedness

In the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Company has made appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability. The Company's BCP ensures that the digital collections and technical infrastructure required to manage and access them can be restored in the event of an emergency.

### Type of Record

1. Accounting, Finance and Taxation records including Annual Financial statement
2. Insurance Records
3. Contracts entered into by the Company including Marketing Contracts
4. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities
5. Legal Files and Records
6. Property Records
7. Employee Related Records.
8. Correspondence and Internal Memoranda
9. Electronic Documents including email retention and back up



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**Annexure - I**

**1. Accounting, Finance and Taxation records including Annual Financial statement**

<b>Record Type</b>	<b>Retention Period</b>	<b>Document Type</b>
Annual Audit Reports and Financial Statements, Tax and Vat Audit	Permanent	Doc - 1
Fixed Asset Register with supporting Purchase Orders and Bills for fixed assets addition	Permanent	Doc - 1
Tax-Exemption original documents and related correspondence	Permanent	Doc -1
Excise Tax, Sales Tax and Service Tax original registration/ eligibility/ exemption certificates	Permanent	Doc - 1
SAP records and files	8 Years	Doc -2
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit	Doc - 2
Vouchers, Supporting, Bank Statement and Cancelled Cheques	8 years	Doc - 2
Cost records	8 years	Doc - 2
Annual Plans and Budgets	3 years after the budget year is closed	Doc - 6
Bank Guarantees	Till the expiry of the claim period	Doc - 6

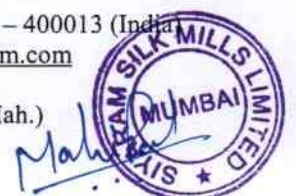
**Responsibility: FINANCE AND ACCOUNTS DEPARTMENT**

**2. Insurance Records**

<b>Record Type</b>	<b>Retention Period</b>	<b>Document Type</b>
Claim Files (Including correspondence, medical records, injury documentation, release , settlements etc.)	Permanent	Doc - 1
All Insurance Policies for the Company/employees	Permanent	Doc - 1

**Responsibility: COMMERCIAL DEPARTMENT**

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**3. Contracts entered into by the Company including Marketing Records**

Record Type	Retention Period	Document Type
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents)	8 years	Doc – 2

**Responsibility: SALES AND MARKETING DEPARTMENT**

**4. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.**

Record Type	Retention Period	Document Type
Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of board and committees thereof, annual reports originals, etc.)	Permanent	Doc – 1
ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing	Doc - 6

**Responsibility: LEGAL AND SECRETARIAL DEPARTMENT**

**5. Legal Files and Records**

Record Type	Retention Period	Document Type
Court Orders	Permanent	Doc – 1
Legal Memoranda and Opinions	3 years after the closure of the matter	Doc – 4
Litigation files	1 year after expiration of disposal of the case	Doc – 4

**Responsibility: LEGAL AND SECRETARIAL DEPARTMENT**



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## 6. Property Records

Record Type	Retention Period	Document Type
Original Purchase / Sale Deeds	Permanent	Doc – 1
Property Assessments, Licenses, Rights of Way	Permanent	Doc – 1
Original Lease Agreements	3 years after expiration of the lease	Doc – 6

**Responsibility: ADMINISTRATION DEPARTMENT**

## 7. Employees Related Records

Record Type	Retention Period	Document Type
Personnel Files of individual employees	Permanent	Doc – 1
Employee/ Workers attendance application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers and salary records	3 years after termination of service of employment	Doc – 6

**Responsibility: HUMAN RESOURCES DEPARTMENT**

## 8. Correspondence and Internal Memoranda

General Principle: Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract

1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years
2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently

**Responsibility: RESPECTIVE DEPARTMENT**

## 9. Electronic Documents including email retention and back up

1. **Electronic Mail:** Not all email needs to be retained, depending on the subject matters

- All e-mail - from internal and external sources to be deleted after 24 months
- Staff will strive to keep all their email related to business issues and delete all unimportant, promotional and other routine mail.
- Central I.T team would archive email for six months after the staff has deleted it after which time the email will be permanently deleted
- Staff will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the Central IT team and the respective Managers
- Staff will take care not to send confidential / proprietary information to outside sources
- Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employee's workplace

**Document Type: Doc 5**

## 2. Electronic Documents including PDF files

- PDF documents - Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end
- Text/ Formatted files : All word / excel / Power point files may be deleted once every year depending on the importance or lack of it

**Document Type: Doc - 3**

## 3. Web page files

- May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015
- May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page

**Document Type: Doc - 3**

**Responsibility: INFORMATION TECHNOLOGY DEPARTMENT**



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The Format of the Register of Documents disposed/ Destroyed

PARTICULARS OF DOCUMENTS ALONG WITH PROVISION OF APPLICABLE LAW	DATE AND MODE OF DESTRUCTION	INITIAL OF DEPARTMENTAL HEAD

