POLICY ON PRESERVATION OF DOCUMENTS

1. BACKGROUND

SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 ("Regulations") require every listed company to formulate a policy on preservation of Documents which has to be approved by the Board of Directors.

In this context, the following policy has been framed by the Board of Directors ("Board") of Shivalik Rasayan Limited with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

This policy can be modified and or amended with the approval of the Board of Directors only.

2. OBJECTIVE OF THE POLICY

The objective of this Policy is to classify the documents, records and registers of the Company which are required:

(i) to be preserved permanently and

(ii) to be preserved for a period of not less than 8 years

3. DEFINITIONS

"Document(S)" refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

"Electronic Record(S)"means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

"Electronic Form" means on any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

'Legal Hold' refers to a direction from Legal to preserve certain data held by employees or databases. All retention periods under this Policy shall be suspended with respect to documents subject to Legal Hold and all documents subject to Legal Hold are to be preserved in strict accordance with Legal Hold instructions and not altered, destroyed or deleted until Legal informs employees that the Legal Hold has ended.

"Maintenance" means keeping Documents, either physically or in Electronic Form.

"Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.

4. OBJECTIVES

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the

Company which are no longer needed or are of no value are discarded after following the due process for discarding the same.

This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

The following aspects are considered while arriving at the preservation period:
- Company's own information retrieval needs (reference value).
- Statutory requirements under respective statutes.
- Litigation requirements.
- Easy retrieval.
- Ensure that unwanted records do not occupy storage space

5. PRESERVATION PRINCIPLES

It is only through preservation that continued availability and access to required documents can be maintained. The following principles shall be kept in mind:-

i. Where possible, documents are preserved in their original format, respecting the physical integrity and authenticity of the original documents.
ii. Active conservation is employed, when appropriate, to prevent further deterioration or damage to a document or to enable access to be given.
iii. Appropriate conservation measures taking into account the needs, value, significance, and usage of the document in question.
iv. Copies shall be created where appropriate to protect the original and to allow wider access to the content. Copies shall not replace the original, which will still need preservation.
v. The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

6. MAINTAINENCE OF RECORDS

i. The content and essential characteristics of digital records must remain unchanged through preservation.
ii. Digital records can be maintained in forms such as emails, web pages or database records, plus scanned versions of paper records that have been digitized in business processes.
iii. Physical records to be maintained in books and files.
iv. A reproduction of any original record shall be certified by a Director, Manager or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.

7. PRESERVATION OF DOCUMENTS

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to-time.

Documents which are to be maintained permanently:

The Company shall maintain the following documents on a permanent basis:

a. The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company
b. Minutes of General Meetings, Board Meetings and various Committee Meetings
c. Register of Members along with Index

d. Foreign Register of Members, if any
e. Register of loans, guarantee, security and acquisition made by the company
f. Register of investments not held in its own name by the company, if any
g. Register of contracts with related party and contracts and Bodies etc. in which directors are interested
h. Register of Charges
i. Registers of Renewed and duplicate share certificates.
j. Register of directors and KMP
k. Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.

Documents which are to be maintained for at least eight financial years:

a. Books of account together with the vouchers relevant to any entry in such books of account
b. Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company
c. Copies of all Annual Returns
d. Disclosure of Interest received from the Directors of the Company in the manner prescribed
e. Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
f. Instrument creating a Charge or modifying a Charge, if any
g. Changes to the Memorandum of Association and the Articles of Association, if any
h. Register of deposits accepted or renewed, if any
i. Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be
j. Employment /Personnel Record in case of employees of the Company
k. Relevant marketing and sales documents
l. Press Releases
m. Legal documents including but not limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters

8. MODE OF MAINTENANCE

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

9. DISPOSAL AND DESTRUCTION OF RECORDS

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

a. Recycle non-confidential paper records;

b. Shred or otherwise render unreadable confidential paper records; or
c. Delete or destroy electronically stored data.

10. REVIEW

This Policy may be reviewed and amended from time to time by the Board, in line with the changing regulatory requirements, or in case the Company faces any practical difficulties in implementing the Policy.