

SBEC SUGAR LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

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1. LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

The Board of Directors SBEC Sugar Limited ("the Company") is required to formulate a policy for "Preservation of Documents" to comply with the requirements of Regulation 9 of the Listing Regulations.

EFFECTIVE DATE

The Policy is effective from December 01, 2015.

2. DEFINITIONS

A. "Board of Directors" or "Board"

Board of Directors or Board shall mean the Board of Directors of SBEC Sugar Limited, as constituted from time to time.

B. "Company"

Company shall mean "SBEC Sugar Limited".

C. "Documents"

Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices Documents etc, and the like as required to be maintained under any law or regulation for the time being in force.

D. "LISTING REGULATIONS"

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 ("Listing Regulation").

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified into two categories:-

A. The documents of a permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also preserved permanently by the Company.

B. The Documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure-2) shall be preserved by the Company for the term not less than eight years after completion of the relevant transaction subject to the modification, amendments, additions, deletion or any changes made therein from time to time.

Provided that all such modification, amendments, additions, deletion in the document shall also be preserved for a term not less than eight years.

Provided further that the company keep the documents as specified above in an electronic mode.

4. ROLE & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operation falling under the charge of each of them, in terms of this policy.

5. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/ regulations either existing or arising out of any amendment to such laws/ regulations or otherwise and applicable to the Company, from time to time.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/ unimportant/ irrelevant.

This applies to both Physical and Electronic Documents.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this shall be handed over as part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of the policy shall be posted on the web- site of the company.

8. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provision of any law for the time being in force.

Annexure 1

Documents whose preservation shall be permanent in nature

S. No.	Nature of Document(s)
01	Registration Certificates
02	Licenses & Statutory Approvals
03	Statutory Registers required under applicable laws
04	Audited Financial statements
05	Minutes of General Meeting
06	Minutes of Board Meeting
07	Minutes of various Committee Meetings
08	Material Agreements/ Contracts
09	Orders Issued by Courts/ Statutory Bodies
10	Investment Documents/ proofs including certificates etc.
11	Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure 2

Documents with preservation period of not less than eight years after completion of the relevant transactions

S. No	Nature of Document(s)
01	Books of Accounts
02	Annual Returns
03	Personal Documents
04	Insurance Policies/ Claims under various policies
05	Correspondences with Departments/ Shareholders
06	Non-statutory Registers/ Documents
07	Films, Videos, CD's, DVD's, Tapes etc.
08	Any other documents as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.