



SKY INDUSTRIES LIMITED

**DOCUMENTS PRESERVATION & ARCHIVAL
POLICY**



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1. Objective

The Board of Directors (the “Board”) of Sky Industries Limited (the “Company”) has adopted this Policy for preservation and archival of documents/records maintained by the Company either in physical mode or electronic mode (hereinafter referred to as “Documents”).

2. This Policy shall be governed by the Companies Act 2013, SEBI Act, Rules, Regulations, Circulars, Guidelines and Directions, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.
3. The purpose of this Policy is to ensure that all the Documents of the Company are adequately protected and preserved as per the statutory requirements and safeguard the Documents from getting mishandled. This Policy shall cover all statutory, business and customer records of the Company, including written, printed and recorded matter and electronic forms of records. The Managing Director/Chief Executive Officer of the Company would be responsible for overseeing the implementation of the Policy. This Policy also envisages the purpose of aiding staff 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 provisions and regulatory requirements.
4. This Policy is applicable to the Company as whole, i.e., all branches, offices and departments of the Company. It shall ensure that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care. This Policy shall remain valid until such time it is modified/amended/alterd by the Board.

5. Definitions

- 5.1 ‘Board of Directors’ or ‘Board’ shall mean the Board of Directors of ‘Sky Industries Limited’, as constituted from time to time.
- 5.2 ‘Company’ shall mean ‘Sky Industries Limited’.
- 5.3 ‘Applicable Law’ means any Law, Rules, Circulars, Guidelines or Standards issued by the Central Government, Exchange Securities Board of India, Ministry of Corporate Affairs, The Institute of Company Secretaries of India or any other statutory/ regulatory authorities, in which the preservation of the Documents is prescribed, and are applicable to the Bank .
- 5.4 ‘Documents’ shall mean all Papers, Files, Vouchers, Registers, Ledgers, Cash Scrolls, Manuals, Agreements, Paid Cheques, Drafts, Orders, Declarations, Forms, Books, Tapes, Floppies, CDs, DVDs, Electronic Storage Devices, etc. and the like as required to be maintained under any applicable law or regulation for the time being in force or in existence, maintained in physical or electronic form or both and does not include multiple or identical copies.
- 5.5 “Electronic Record(s)” means the electronic record as defined under section 2 (1)(t) of the Information Technology Act, 2000.



- 5.6 "Electronic Form" means any contemporaneous electronic devices such as Computer, Laptop, Desktop, Compact Disc, space on electronic cloud or any other form of electronic storage and retrieval device, considered feasible, whether the same is in possession or control of the Bank or otherwise the Bank has control over the access to it.
- 5.7 'SEBI Listing Regulations' shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations').
- 5.8 "Maintenance" means keeping Documents, either physically or in Electronic Form.
- 5.9 "Preservation" means to keep in good order, preventing from being altered, damaged or destroyed.
- 5.10 Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.
6. The Company should take appropriate steps to evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities as per the Applicable Law.

7. Principle Of Responsibility Of Employees For Preservation Of Documents

All the employees in the permanent or contractual rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their area of work / assignments and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help the Company's litigation preparedness, helping the Legal Department and External Legal Counsels of the Company in tracking down the documents and to efficiently handle the legal cases.

8. Classification Of Documents

Based on the recommendations of the Management, the Board has classified the following documents to be retained and preserved for future as required under the relevant provisions of applicable Law & Rules:

Category A	The Documents of permanent nature shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time; provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.
Category B	The Documents of the Company to be maintained and preserved for specified time period after completion of the relevant transactions shall be preserved by the Company for the term not less than ten years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the Documents shall also be preserved for a term not less than ten years. Further the Company may, if deemed fit and possible from time to time, maintain mentioned documents in electronic form, to the extent possible.



An indicative list of Documents and the time-frame of their preservation is provided in Annexure I to this Policy.

Note:

- i. Documents which are required to be mandatorily maintained and preserved by the Company shall be preserved for such duration as may be specified by the relevant statute or regulation, as the case may be.
- ii. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this Policy.
- iii. All the documents, records that are statutorily required to be hosted on the website of the Company as per SEBI regulations or other applicable law, shall be hosted on the website for a minimum period of 5 (five) years or for such period as may be mentioned in the relevant law, whichever is later.
- iv. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this Policy.

9. Mode of Preservation

The Documents may be preserved in Physical Form or Electronic Form. The retention period of preservation of documents shall remain the same, irrespective of maintenance of documents in physical or electronic format or both.

The officer of the Company required to preserve the Document shall be an Authorized Persons, who is generally expected to observe the compliance of the requirements of Applicable Law.

The preservation of Documents should be such as to ensure that there is no tampering, alteration and destruction. Nothing shall be done which endangers the content, authenticity, utility or accessibility of the Documents.

The Documents should be categorized based on their nature and confidentiality. The original Documents of Importance is to be kept in fire proof storage and, if required, locker facility can be availed to ensure safe-keeping of the records and to safeguard the Documents from getting mishandled.

The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Persons with preservation, so as to ensure integrity of the Documents and to prohibit the unauthorized access.

All policies, documents and other information not related to any particular period/ event shall be on display on the Company's website till they are replaced by an updated version. Thereafter they will be archived and preserved in a secured server of the Company.

All events or information which, in the opinion of the Board of Directors of the Company, is material and has hence been disclosed to the stock exchange(s) in terms of Regulation 30 of the Listing Regulations, shall remain on display on the website of the Company for such period time as may be prescribed by the SEBI Listing Regulations from time to time and thereafter shall be archived for retrieval for a period of three years after the same is



archived. For ensuring safety of the data hosted on the website of the Company, a backup of the website shall be taken on regular intervals.

10. Destruction of Documents

- a) Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.
- b) The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice.
- c) The documents specified in the Annexure to this Policy, kept by the Company, may be destroyed after the expiry of the minimum retention period specified in the Annexure and after review and approval by the Managing Director or such other person(s) as may be authorized by the Board for this purpose. However, in the case of pending matters/ litigation/ disputes, the documents shall be preserved till the resolution of pending matter/ litigation/ dispute.

11. Location Of Records

As per relevant provisions of the Companies Act, 2013 and Rules framed there under and any other applicable acts, rules and regulations if any, mandated to keep certain records at the Registered Office of the Company shall be located at the Registered Office of the Company. The records for which no specific place has been specified may be maintained at the corporate office of the Company or at any other place as may be, decided by the officers of the Company considering their utilization and usefulness.

12. Responsibility Of Preservation Of Documents

Management of the Company are obligated to ensure the preservation of documents pertaining to their areas of responsibilities in accordance with the applicable laws/regulations.

13. Amendments to this Policy

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.



ANNEXURE 1

Under this policy, the retention period of preservation of documents shall be as under:

CATEGORY A : PERMANENT PRESERVATION

- i. Register of Members along with the Index.
- ii. Statutory Registers
- iii. Statutory Forms and disclosures except routine compliances.
- iv. Minutes of the Board Meeting, various Committees Meetings and General Meetings.
- v. Scrutinizer's report.
- vi. License and Permissions.
- vii. Policies formed by the Company under various laws and regulations.
- viii. Court Orders.
- ix. Such other records as may be required under any law(s), from time to time.

CATEGORY B : TEMPORARY PRESERVATION UPTO 8(EIGHT) YEARS

- i. Register of debenture holders or any other security holders along with the index.
- ii. Annual Returns and copies of all certificates and documents required to be annexed thereto.
- iii. Books of account and supporting documents, vouchers, records, contract, deeds, agreements, etc.
- iv. Attendance registers.
- v. All notices under Section 184 of the Companies Act, 2013 read with Rule 9 of the Companies (Meetings of Board and its powers) Rules, 2014.
- vi. Agenda papers, Notice of Board Meeting, Committee Meeting, General Meeting and other related papers.
- vii. Instrument creating a charge or modification thereon.
- viii. Such other records as may be required under any law(s), from time to time.
