



POLICY ON PRESERVATION OF DOCUMENTS

1. PURPOSE

This Policy on Preservation of Documents / Records “Policy”] by Sical Logistics Limited [“SICAL”] is evolved in accordance with the provisions of the Companies Act, 2013 and Clause 9 of Chapter III of the SEBI [Listing Obligations and Disclosure Requirements] Regulations, 2015 [“LODR”].

This Policy is intended to define SICAL’s preservation of documents based on their severity which forms basis for its functioning, records to deal with all its stakeholders, defending litigations and providing details / data to regulatory authorities as and when required.

This Policy aims at systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The scope of this policy is to define on identifying documents that need to be maintained, the period upto which they are to be retained and achieved / disposed of, if no longer needed and to access and retrieve when needed.

2. CATEGORISATION OF DOCUMENTS TO BE PRESERVED / RETAINED

Based on the recommendations of the management of the Company, the Board of Directors have classified the following documents to be retained and preserved for posterity.

S.No.	Details
1	Documents that need to be preserved / retained permanently
2	Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013
3	Documents that are to be preserved electronically and archived when necessary
4	Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case
5	Other documents which may be retained for less than 8 years.

3. DETAILS OF DOCUMENTS TO BE PRESERVED / RETAINED PERMANENTLY

Type of Records	Retention Period
Annual audit reports and financial statements	Permanent
Insurance claim files	Permanent
Certificate of Incorporation, Uniform Listing Agreement, Common Seal, Minuts Book of Board and Committees thereof, annual reports	Permanent
Licence and Permits, industrial entrepreneurial Memorandum and other statutory approvals	Permanent or until surrendering such licences to the authorities
Property Records - Deeds and due payment of taxes [originals]	Permanent until the property is retained
Personal files of employees	Permanent

4. DETAILS OF DOCUMENTS TO PRESERVED FOR 8 YEARS OR LESSER PERIOD

Type of Records	Retention Period
Accounting records of all nature	8 years
Tax records	8 years
Contracts and all related papers	8 years
Correspondence with clients / customers	8 years
ROC filings and Stock Exchange filings in physical and electronic form	5 years from the date of filing

5. ELECTRONIC DATA RETENTION AND ARCHIVAL POLICY

The details as contained in the web site relating to compliances on the Listing Agreement / SEBI LODR Regulations / Companies Act are to be retained in the web site for a period of 5 years and shall be archived and made available to any of the viewers for a period of 3 years thereafter under a separate heading ARCHIVES and removed and stored separately by the IT Department.

6. RESPONSIBILITY FOR PRESERVATION OF DOCUMENTS

All the employees of the Company are considered to be responsible for taking appropriate decisions in retaining, preservation and further disposal of documents / records.

7. PERIODICAL REVIEW OF THE POLICY BY MANAGEMENT

This Policy is subject to periodical review by the management and approval by the Board based on the requirements and in line with any regulatory / legislative requirements and changes thereto.

8. GOVERNANCE OF POLICY

The Documents Retention process shall be in accordance with the list provided in the policy for the purpose of maintenance, retention and disposal of records.

9. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR ANY INSPECTION BY STATUTORY AUTHORITIES

In the event of the Company being served with any notice for request of documents or any of the employee becomes aware of any investigation, inspection or audit by statutory authorities concerning SICAL or commencement of any litigation against the Company, such employee shall inform the Management and any further disposal of documents shall be suspended until such time as the Management with the due advice from the legal counsel thinks fit as also duly intimating all employees in this regard.

10. **APPROVAL OF BOARD OF DIRECTORS**

This policy was approved by the Board of Directors at its meeting held on 03rd May, 2016.