

POLICY FOR PRESERVATION OF DOCUMENTS

1. Pursuant to Regulation 9 of the Securities & Exchange Board of India (Listing Obligations and Disclosures Requirements), Regulations, 2015 (“Listing Regulations”), the Company is required to formulate a policy for prevention of documents.

2. OBJECTIVE

This objective of the policy is to set the standards for storing and preservation of documents of the Company broadly classified in the following two categories: a) documents whose preservation shall be permanent in nature ; b) documents with preservation period of not less than eight years after completion of the relevant transactions.

3. DEFINITIONS

- i. **“Act”** shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.
- ii. **“Listing Regulations”** shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any statutory modifications thereof.
- iii. **“Listing Agreement”** shall mean an agreement entered between a recognised stock exchange and the Company pursuant to the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- iv. **“Company”** shall mean Servotech Power Systems Limited.
- v. **“Board of Directors”** or “Board” means the Board of Directors of the Company, as constituted from time to time.
- vi. **“Documents”** shall mean all papers, records, approvals, licenses, notices, files, registers, books, declarations, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- vii. **“Financial year”** shall have the same meaning as assigned to it under sub-section (41) of section 2 of the Companies Act, 2013;
- viii. **“Key Managerial Personnel”** mean key managerial personnel as defined in subsection (51) of section 2 of the Companies Act, 2013;
- ix. **“Policy”** means this policy for preservation of documents as may be amended from time to time.

The words and phrases used in this policy which are not defined here shall derive their meaning from the applicable laws and regulations, as the case may be.

4. POLICY

The company has classified the preservation of documents in the following manner:

- a) Documents to be preserved permanently;
- b) Documents to be preserved for a period of 8 years as specified under the Companies Act, 2013 or Listing Regulations; or any other law;
- c) Documents to be preserved for such period as prescribed under any law as applicable to the Company; and
- d) Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

An indicative list of documents to be preserved is annexed as **Annexure A**.

5. MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents. The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Department Head, so as to ensure integrity of the documents and to prohibit unauthorized access.

6. PRESERVATION LOCATION

The preservation location will be the concerned department subject to the provisions of applicable laws and regulations.

If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

7. RESPONSIBILITY

The concerned departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

8. DESTRUCTION OF RECORDS

The records/documents preserved shall be reviewed every year or according to the need of the respective department. The documents may be destroyed in such mode / instruction as approved by the department head(s). The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at **Annexure-B**. The entries in the register shall be authenticated by the Department Head.

9. REVIEW

The Board of Directors of the Company may review the 'Policy' from time to time and subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the 'Policy' entirely with a new policy.

ANNEXURE -A

Indicative List*

1. PERMANENT PRESERVATION:

- a) Common Seal,
- b) Minutes books of Board, General Meetings and Committee Meetings,
- c) Statutory Registers,
- d) License and Permissions,
- e) Statutory Forms and disclosures except for routine compliance,
- f) Scrutinizers' Report,
- g) Register of Members and
- h) Index of Members.

2. TEMPORARY PRESERVATION UPTO 8 YEARS

- a) Annual Returns,
- b) Board Agenda and supporting documents,
- c) Attendance Register,
- d) Office copies of Notice of General Meeting and related papers,
- e) Office copies of Notice of Board Meeting/Committee Meeting, Notes on Agenda and other related papers,
- f) All notices pertaining to disclosure of interest of directors,
- g) Instrument creating a charge or modification,
- h) Books of accounts, financial statements etc. and
- i) Register of debenture holders or any other security holders.

3. OTHERS As per applicable laws and regulations

*Note: *The above list is indicative only. Concerned departments need to adhere with applicable laws and regulation as may be amended time to time.*

ANNEXURE- B

SPECIMEN FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED-OFF/DESTROYED

Sl. No.	Date and Particulars of Document	Name of the Applicable Law	Minimum Period required for preserving document	Date and mode of destruction	Signature of Authorised Person / HOD
(1)	(2)	(3)	(4)	(5)	(6)