



SYLVAN PLYBOARD (INDIA) LIMITED

Preservation of Documents & Archival Policy

**Under Regulation 9 and 30(8) of SEBI (*Listing Obligations and Disclosure Requirements*)
*Regulations, 2015 (Listing Regulations)***

Registered Office: NH-2, Delhi Road, Champsara, Chinnamore, Baidyabati,
Hooghly-712222, WB

Corporate Office: Adventz Infinity@5, Office No. 802, Block - BN5, Sector - V,
Saltlake, Kolkata-700091

Policy for Preservation of Documents & Archival

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 of **Sylvan Plyboard (India) 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.

The Board of Directors has adopted this Policy for Preservation of Documents & Archival (the “Policy”) at its meeting held on 27th June 2024.

2. DEFINITIONS

A. “Board of Directors” or “Board” shall mean the Board of Directors of Sylvan Plyboard (India) Limited, as constituted from time to time.

B. “Company” Company shall mean “**Sylvan Plyboard (India) Limited**”.

C. “Documents” Documents shall mean all papers, records, files, books, 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.

D. “Listing Regulations” Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

E. “Policy” or “This Policy” means, “Policy on Preservation of Documents.”

F. “Maintenance” means keeping Documents, either physically or in Electronic Form.

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

H. “Electronic Form” means any contemporaneous 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.

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following 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 be 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 transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

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

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations 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. MODES OF PRESERVATION

The Documents may be preserved in

- a) Physical form; or
- b) Electronic Form.

The official of the Company required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

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 Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

7. 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.

8. COMMUNICATION AND DISSEMINATION OF THE POLICY

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

9. 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 provisions of any law for the time being in force.

10. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary / Board of Directors will keep the policy updated as per applicable statutory guidelines.

ANNEXURE - 1

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

A) Companies Act, 2013:

- 1) Memorandum and Articles of Association as amended from time to time
- 2) Certificate of Incorporation
- 3) Document filed for incorporation
- 4) Register of Contracts or arrangement in which director are interested
- 5) Register of Directors and KMPs and the securities held by them
- 6) Register of Loans and Investments made by the Company
- 7) Register and Index of Members
- 8) Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots
- 9) Resolutions passed by Circulation
- 10) Various Forms and returns filed with the Authorities
- 11) Audited Financial Statements.
- 12) License, documents, approvals etc. received from any government or regulatory authority
- 13) Intellectual property documents
- 14) Orders, Judgments of court or any adjudicating authority
- 15) Title deeds of properties

B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- 1) Listing Agreement executed with the Exchanges.
- 2) Trading approval relating to listing of securities.
- 3) Offer documents for Public Issues and Private placement of securities filed with Securities and Exchange Board of India.

C) Depositories Act:

- 1) Confirmation of all Corporate Actions in respect of allotment of securities.
- 2) Intimation on allotment of International Securities Identification Numbers (ISIN) for securities issued.

D) Others:

Register of Records and Documents destroyed.

ANNEXURE - 2

I. DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS UNLESS SPECIFIED UNDER ANY OTHER ANY ACT OR RULES, FOR A LONGER DURATION:

A) Companies Act 1956 / Companies Act, 2013:

- 1) Register of Buy-back of Securities from the date of completion of buy-back
- 2) Notices of the Board, Committees of the Board, General Meetings and Postal Ballots
- 3) Register of Charges from the date of satisfaction of respective charge
- 4) Register of Debentures and Debenture Trust Deed from the date of its redemption
- 5) Books of Accounts including vouchers and bills
- 6) Annual Returns together with the Annexure
- 7) Attendance registers, notices, scrutinizer's report, agenda, notes to agenda and other related papers of general meetings, board meetings and various committee meetings;
- 8) Register of Transfer and Transmission of shares / Debentures and other securities
- 9) Scrutinizer's Report on Postal Ballot and AGM
- 10) Documents relating to appointment of Managerial Personnel
- 11) Dividend reconciliation statement till the time the dividend is transferred to IEPF
- 12) Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
- 13) Employment and personnel records.
- 14) Declaration by directors under section 164 of the Companies Act, 2013
- 15) Declaration by directors under section 184 of the Companies Act, 2013

B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- 1) All reports filed with the stock exchanges from time to time
- 2) All disclosure of various events and Press Releases
- 3) Intimations of Board Meetings

C) Documents filed with Stock Exchanges under SEBI Regulations:

All disclosures and intimations filed under:

- 1) SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011
- 2) SEBI (Prohibition of Insider Trading) Regulations, 2015
- 3) All disclosures and intimations filed under SEBI (Share Based Employee Benefit) Regulation, 2014 and SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines 1999
- 4) Structure Digital Database as per SEBI (Prohibition of Insider Trading) Regulations, 2015 after completion of the relevant transactions and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

II. DOCUMENTS WHOSE PRESERVATION OF SHALL BE MINIMUM PERIOD OF THREE YEARS AFTER COMPLETION OF EVENTS UNLESS SPECIFIED UNDER ANY OTHER ANY ACT OR RULES, FOR A LONGER DURATION:

1. Tender Documents
2. Lease Deeds and Contracts
3. Legal files
4. Insurance Records including policies and claims
5. All e-mail correspondence, internal & external.
6. Documents under Secretarial Standards Proof of sending:
 - i) Notice of the meetings of the Board / Committee and General meetings and its delivery.
 - ii) Proof of sending Agenda and Notes on Agenda and their delivery.
 - iii) Proof of sending and delivery of the draft of the Resolution.
 - iv) Proof of sending draft Minutes of the Board / Committee and its delivery.
 - v) Proof of sending signed Minutes of the Board / Committee and its delivery.
7. Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.