
POLICY FOR DOCUMENTS RETENTION AND ARCHIVAL

THE SANDESH LIMITED

(CIN: L22121GJ1943PLC000183)

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POLICY FOR DOCUMENTS RETENTION AND ARCHIVAL

(As approved at the Meeting of the Board of Directors on November 06, 2015)

In terms of the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the Regulations), the Company shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows-

- (a) documents whose preservation shall be permanent in nature ;
- (b) documents with preservation period of not less than eight (8) years after completion of the relevant transactions.

The Company may keep documents specified in clauses (a) and (b) in electronic mode.

Further, the Company shall disclose on its website all such events or information which has been disclosed to stock exchanges under Regulation 30, and such disclosures shall be hosted on the website of the Company for a minimum period of five (5) years and thereafter as per the archival policy of the Company, as disclosed on its website.

A. Effective Date of Policy: 01st December, 2015

B. Objective of the Policy

The Company is required to maintain various corporate records. For certain corporate records, specified time period of their maintenance is prescribed by the applicable law.

C. Scope of the Policy

1. This Policy for preservation of documents aims to ensure safekeeping of the corporate records and to avoid superfluous stock of the corporate documents. This Policy will guide the Company, employees and officers in handling the documents efficiently and maintenance of any documents, their preservation and disposal/destruction.
2. The corporate records includes documents, notices, agreements, contracts, papers, notes, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or

any other record, required to be prepared and maintained under any applicable Law, whether issued, forwarded, dispatched, sent, received or kept in pursuance of the applicable law for the time being in force or otherwise, maintained / preserved on paper or in electronic form, however, the same does not include multiple or identical copies of the same.

3. The secretarial department of the Company will provide the disclosures made to the Stock Exchanges on which the equity shares of the Company are listed, to the corporate communication department of the Company for uploading in the website of the Company.
4. The information provided to the corporate communication department will be uploaded on the website of the Company. The said information will be hosted on the website for five (5) years period from the date of such hosting.
5. Thereafter, keeping in view the nature, materiality, impact and relevance of such material event or information, the disclosure of such material event or information can continue to remain hosted on the Company's website for a longer period of time, as may be decided by the Board from time to time. Such information will be archived under the appropriate section of the website of the Company.
6. The corporate records which are relevant to legal proceedings or potential legal proceedings shall be preserved in accordance with the advice of the Legal Department of the Company.
7. The physical documents may be converted into electronic form to ensure easy access and also for efficient utilization of the available space.
8. The documents shall be accessible at all reasonable times and it may be controlled by authorized employee in order to ensure integrity of the documents and at the same time also prohibits unauthorized access of the same.
9. Custody of the documents shall be with the authorised employee only and in case if said employee is transferred or tenders resignation, said employee shall immediately hand over all the relevant documents, password, compact discs, other storage devices.

10. The Company shall maintain / retain the records pertaining to the meetings of the Board / its Committee of the Company, copies of press releases, publicly filed documents, books of accounts, records regarding taxation, contracts / agreements, employment records, etc. as per the directions of the Managing Director of the Company from time to time, keeping in view the applicable laws relating the preservation, maintenance, retention and archival of the corporate records.
11. The documents shall be destroyed after the prescribed period by the authorised employee after the prior approval of the authority or of the Managing Director.

D. Limitation of Policy and its Review

In case of any conflict between the provisions of this Policy and the Regulations or the Companies Act, 2013 or any other statutory enactments, the provisions of such Regulations or the Companies Act, 2013 or other statutory enactments, shall prevail over this Policy.

This Policy is formulated taking in view extant provisions of the Regulations. In case of any confusion or doubt with respect to any provision of this Policy or as and when the Board deems necessary to review this Policy or its provisions, the Board will take an appropriate decision. Further, this Policy and its provisions are subject to any modification, revision, replacement, variation, deletion, addition or amendment in accordance with the regulatory amendments and guidelines as may be issued / imposed by SEBI, from time to time.
