



POLICY ON PRESERVATION OF DOCUMENTS

Pursuant to Regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

SAMBHAAV MEDIA LIMITED

CIN: L67120GJ1990PLC014094

Registered Office: Sambhaav House,

Opp: Judges' Bungalows, Premchandnagar Road, Ahmedabad – 380015

Phone: +91 79 26873914/15/16/17; Email: secretarial@sambhaav.com

Website: www.sambhaav.com

1. EFFECTIVE DATE:

This policy shall be effective from December 01, 2015.

2. POLICY:

Regulation 9 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015, requires every Listed Company, whose specified securities are listed on any recognized Stock Exchange(s) shall frame 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 years after completion of the relevant transactions.

Accordingly, the Company has classified the preservation of documents to be done in the following manner:

- 2.1 Documents that needs to be preserved and retained permanently.
- 2.2 Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulation, 2015.
- 2.3 Documents that need to be preserved and retained for such period as prescribed under any other law applicable to the Company.

3. MODES OF PRESERVATION:

The documents may be preserved in:

- a) Physical Form; or
- b) 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 Authorized Person, so as to ensure integrity of the Documents and prohibit unauthorized access.

The documents of the Company which are no longer required as per the time schedule prescribed in the "Annexure A" may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the Document Preservation Schedule given under Annexure A. 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 in "Annexure B". The entries in the Register shall be authenticated by the Authorized Person.

4. POLICY REVIEW:

This Policy shall be reviewed from time to time so that the policy remains in compliance with applicable legal requirements. The Company Secretary will keep the Policy updated as per applicable statutory guidelines.

ANNEXURE A: DOCUMENT PRESERVATION SCHEDULE

The Document Preservation Schedule is organized as follows:

Section Topic

- A. Corporate Documents
- B. Property Documents
- C. Contract Agreements
- D. License Agreements and IPR related Agreements
- E. Employee Contracts and other Employee Related Records
- F. Legal and Statutory Documents
- G. Financial and Tax Documents
- H. Other Records

A. Corporate Documents		
Sr. No.	Document type	Minimum Preservation Period
Documents to be retained permanently		
1.	Common Seal	Permanent
2.	Incorporation Documents	Permanent
3.	Share Certificates	Permanent
4.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
5.	Statutory Registers	Permanent
6.	Statutory Forms	Permanent
7.	Scrutinizers Reports	Permanent
8.	Register of Members	Permanent
9.	Index of Members	Permanent
10	Corporate Policies framed under Companies Act, 2013 and / or Listing Agreement and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Permanent

Documents to be retained for a minimum period of 8 years		
1.	Annual Returns and copies of all certificates and documents required to be annexed thereto	8 years from the filing with the Ministry of Corporate Affairs
2.	Board Agenda and supporting documents	8 years
3.	Attendance Register	8 years
4.	Disclosures/ Notices by a director of his interest	8 years
5.	Instrument creating a Charge or Modification or Satisfaction	8 years from the date of satisfaction of charge

Miscellaneous		
1.	Joint Venture Agreements	Permanent or 8 years from termination of Agreement whichever is earlier
2.	Shareholder's Agreement	Permanent or 8 years from termination of Agreement whichever is earlier

B. Property Documents		
Sr. No.	Document type	Minimum Preservation Period
Documents to be retained permanently		
1.	Original Purchase and Sale Agreement	Permanent
2.	Property Card, Ownership records issued by Government Authority	Permanent
3.	Latest Property Insurance	Permanent or 8 years from the date of disposal whichever is earlier.
4.	Documents / Agreements of leases, transfers and conveyances	Permanent

C. Contract Agreements		
Sr. No.	Document type	Minimum Preservation Period
Documents to be retained for a minimum period of 8 years		
1.	Originals of all project documents	8 years from expiry date of all contractual obligations
2.	Tender documents	8 years from expiry date of all contractual obligations
3.	Contract agreements	8 years from expiry date of all contractual obligations
4.	Consortium agreements and any similar documents	8 years from expiry date of all contractual obligations
5.	All design drawings, specification of contracts	8 years from expiry date of all contractual obligations

D. License Agreements		
Sr. No.	Document type	Minimum Preservation Period
Documents to be retained permanently		
1.	Trademark Registration	Permanent

E. Employment Contracts and other Employee related records

Sr. No.	Document type	Minimum Preservation Period
Documents to be retained for a minimum period of 8 years from the date of retirement or dismissal of any employee by Nila Infrastructures Ltd.		
1.	Payroll registers	8 years
2.	Records relating to promotion, demotion, lay-off, or discharge of employees	8 years
3.	Appointment / Resignation / Termination Letter	8 years
Miscellaneous		
1.	Stop payment orders	5 years from the date of retirement or dismissal of any employee by Nila Infrastructures Ltd.

F. Legal and Statutory Documents		
Sr. No.	Document type	Minimum Preservation Period
1.	All documents related to legal like arbitration or mediation proceedings, Court Orders, court proceedings and any settlement agreements and outside counsels' legal opinions and Legal case papers	8 years from the date of the relevant final decision rendered by the competent authority against which no appeal has been preferred by any person and / or party
2.	Statutory documents	As prescribed in the respective prevailing law.

G. Financial and Tax Documents		
Sr. No.	Document type	Minimum Preservation Period
Documents to be retained permanently		
1.	Original Applications made for availing of various licenses / permissions / registrations	Permanent
2.	All sales tax / VAT / Service Tax and such other registration certificates	Permanent
3.	Original Voucher of all Projects	Permanent or 8 years from date of sale whichever is earlier.
4.	Annual financial statements	Permanent
Documents to be retained for a minimum period of 8 years from the end of Financial Year or completion of assessment under the applicable law whichever is later		

1.	Accounting books and records including all relevant certificates and documents, invoices, sales bill, expense vouchers, Journal entries, A/P Paid invoices, A/R invoices and other relevant accounting records etc.	8 years
2.	Bank reconciliations	8 years
3.	General ledger	8 years
4.	Annual audit records	8 years
5.	All type of Tax returns	8 years
6.	Sales and use, property and other tax returns	8 years
7.	Superseded cheque signature authorizations	8 years
Miscellaneous		
1.	Stop payment orders	5 years
2.	Registration Book of Vehicle.	Permanent or 5 years from sale of vehicle whichever is earlier.
3.	Insurance Policies	5 years from the date of its expiry
4.	All Other accounting and tax documents	As prescribed in respective prevailing law.

H. Other Records		
Sr. No.	Document type	Minimum Preservation Period
As may be relevant according to statutory / business requirements.		

**ANNEXURE B: SPECIMEN FORMAT OF THE REGISTER OF DOCUMENTS
DISPOSED OF/DESTROYED**

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON