

SATYA MICROCAPITAL LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

November, 2023

Version 1.0

POLICY FOR PRESERVATION OF DOCUMENTS, 2018

1. PREFACE AND OBJECTIVE

Satya MicroCapital Limited (“Company”), being a listed entity, is obligated to frame a policy for preservation of documents in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI-LODR).

Regulation 9 of the aforesaid Regulations requires the Board of Directors of the Company to frame a Policy for Preservation of Documents (“Policy”) classifying them into two categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than eight years.

The listed entity may keep such documents in electronic mode.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that all the documents, whether in physical or electronic mode, form an important and integral part of the Company’s records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication. Accordingly, the Board of Directors of the Company has adopted the Policy for Preservation of Documents.

The Policy is framed in line with the existing provisions of SEBI-LODR. Any future changes in the SEBI LODR will, ipso facto, apply to this Policy. The Policy has been approved by the Board of Directors in its meeting held on November 14, 2018.

2. Applicability and Modes of Preservation

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

3. Definitions

- a. “Act” means the Companies Act, 2013;
- b. “Applicable Law” means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA) , The Institute of Company Secretaries of India (ICSI) and other professional bodies under which the preservation of documents has been prescribed.

- c. "Board" means the Board of the Directors of the Company.
- d. "Company" means Satya MicroCapital Limited.
- e. "Documents" refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.
- f. "Electronic Form" means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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.
- g. "Maintenance" means keeping documents, either physically or in Electronic Form.
- h. "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- i. "SEBI LODR" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

4. EFFECTIVE DATE

The Policy shall be effective from November 14, 2018

5. RESPONSIBILITY

The Heads of respective Departments of the Company shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/ concerned Functional Director/ Head of the Department.

This applies to both physical and electronic documents.

7. 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.

8. AMENDMENT TO THE POLICY

The Board of Directors of the Company are severally authorized to amend or modify this Policy on recommendations of the Audit Committee. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

ANNEXURE A

Records as per Companies Act, 2013		
Sr. No.	Record Type	Preservation Period
1	Memorandum and Articles of Association	Permanent
2	Certificate of Incorporation	Permanent
3	Minutes of Board and Committee Meetings	Permanent
4	Minutes of Shareholders' Meetings	Permanent
5	Register and Index of Members	Permanent
6	Resolutions passed by circulation	8 Financial Years
7	Listing Agreement executed with the stock exchanges	Permanent
8	Any other document, certificates, statutory registers that may be required to preserved permanently in terms the Companies Act, 2013 and/ or SEBI Regulations.	Permanent
9	Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers	8 Financial Years
10	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
11	Correspondence with shareholders	8 Financial Years
12	Newspaper cuttings of Financial Results	8 Financial Years
13	Investor meet presentations	8 Financial Years
14	Forms filed with Registrar of Companies (ROC)/ Ministry of Corporate Affairs in compliance with the Companies Act, 2013 & Rules thereunder	Permanent
15	Annual Reports	Permanent
16	Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI-LODR, as amended from time to time.	
17	Annual Returns (copies of all certificates and documents required to be annexed thereto)	8 Financial Years

Accounts and Finance Records		
Sr. No.	Record Type	Preservation Period
1	Annual Audited and Financial Statements	Permanent
2	Books of Accounts, Ledgers & Vouchers	8 Financial Years

3	Investment Records	8 Financial Years
4	Engagement letters from Auditors	8 Financial Years
5	Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return.	8 Financial Years
6	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax	8 Financial Years