

## **POLICY ON PRESERVATION OF DOCUMENTS - SOFTSOL INDIA LIMITED**

[Pursuant to Clause 9 of SEBI

(Listing Obligations and Disclosure Requirements) Regulations, 2015]

### **1. PREAMBLE**

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 SOFTSOL 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 by 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.

The policy is applicable to all Documents maintained in Physical and electronic mode by a listed entity.

### **2. DEFINITIONS**

- a. **“Board”** or **“Board of Directors”** means Board of Directors of the Company.
- b. **“Company”** means SOFTSOL INDIA LIMITED.
- c. **“Documents”** means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.
- d. **“Electronic Form”** with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.
- e. **“Policy”** or **“This Policy”** means, Policy on Preservation of Documents.
- f. **“Financial Year”** shall have the same meaning as assigned to it under Section 2(41) of the Companies Act, 2013.
- f. **“Regulation”** or **“Listing Regulation”** means the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended or re-enacted from time to time.
- g. **“SEBI”** means Securities and Exchange Board of India constituted under SEBI Act 1992 or similar authority.

The words importing the singular include the plural and *vice versa* and pronouns importing a gender include each of the masculine, feminine and neuter genders and shall be interpreted in the wide sense in spirit of this Policy.

### **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. 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

#### **6. 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

#### **7. AMENDMENT**

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

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**Documents whose preservation shall be permanent in nature**

**Annexure - 1**

Si No.	Nature of Document(s)
1	Registration Certificates
2	Common Seal
3.	Certificate of Incorporation, Certificate Permanent Secretarial of Change in Name etc.
3	Licenses & Statutory Approvals
4	Statutory Registers required under applicable laws
5	Audited financial statements
6	Minutes of General Meeting
7	Minutes of Board Meeting
8	Minutes of various Committee Meetings
9	Material Agreements/Contracts
10	Orders issued by Courts/Statutory bodies
	Original Property Purchase and Sale Agreement
11	Investment Documents/proofs including certificates etc.
12	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

**Documents with preservation period of not less than eight years after completion of the relevant transactions**

**Annexure - 2**

Si No.	Nature of Document(s)
1	Books of Accounts, Ledgers and Vouchers
2	Tax Deducted at Source Records
3	Income Tax papers
4	Service Tax papers
5	Annual Return(s)
6	Personnel Documents
7	Insurance Policies/ Claims under various policies
8	Correspondences with Departments/shareholders
9	Non-Statutory Registers/Documents
10	Instrument creating a charge or modification
11	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

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