

SUMEDHA FISCAL SERVICES LIMITED

Policy for Preservation of Documents

1. Preamble:

The Securities and Exchange Board of India (SEBI) has issued and notified “SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Regulations”) on 2nd September 2015.

The Regulations requires the Board of Directors of a company to frame a Policy for Preservation of Documents classifying them in to two categories:

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

The Documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that documents whether in physical or electronic mode, forms 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 Sumedha Fiscal Services Limited (the “Company”) has adopted this Policy for preservation of documents.

2. Applicability:

This Policy is applicable to all Documents maintained in physical and electronic mode by the Company.

The Documents not 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. Documents:

For the purpose of this Policy the term “*Documents*” shall mean statutory records, registers, returns, forms etc. required to be maintained and preserved by the Company in physical or electronic form under the Companies Act, 1956 / Companies Act, 2013, Securities and Exchange Board of India Act, 1992, Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1996.

4. Documents to be preserved permanently:

A) Companies Act, 2013:

- Memorandum and Articles of Association as amended from time to time.
- Certificate of Incorporation
- Certificate of Commencement of Business
- Register of Contracts.
- Register of Directors and KMPs and the securities held by them.
- Register of Loans and Investments made by the Company.
- Register and Index of Members.
- Register of Investments in securities not held in the name of the Company
- Register of Transfers and Transmission of Shares
- Register of Renewed and Duplicate Certificates
- Register of Charges
- Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots.
- Resolutions passed by Circulation.
- Various Forms and returns filed with the Authorities. - Audited Financial Statements.

B) SEBI Merchant Banking Regulations:

- Certificate of Registration issued by SEBI.

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

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

D) Depositories Act:

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

E) Others:

- Register of Records and Documents destroyed.

5. Following documents shall be preserved and maintained for a period of 8 years from the date of its event, unless specified under any other any Act or rules, for a longer duration:

A) Companies Act 1956 / Companies Act, 2013:

- Register of Buy-back of Securities from the date of completion of buy-back
- Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots.
- Attendance Register of Meetings
- Proxy Register
- Disclosure of Interest from Directors in MBP-1
- Consent letters / engagement letters from Auditors
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- Instrument creating the Charge from the date of satisfaction of respective Charge
- Register of Debentures and Debenture Trust Deed from the date of its redemption.
- Books of Accounts including vouchers and bills.
- Annual Returns together with the Annexures.
- Register of Transfer and Transmission of shares / Debentures and other securities.
- Scrutinizer's Report on Postal Ballot and AGM.
- Documents relating to appointment of Managerial Personnel.
- Dividend reconciliation statement till the time the dividend is transferred to IEPF.

B) SEBI Merchant Banking Regulations:

- Half-yearly reports.
- Orders, if any, passed by SEBI with respect to Merchant Banking activities.

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

- All reports filed with the stock exchanges from time to time.
- All disclosure of various events and Press Releases.

- Intimations of Board Meetings.
- All correspondences with the shareholders
- All newspaper Publications
- Investor Meet Presentations

D) Documents filed with Stock Exchanges under SEBI Regulations

-All disclosures and intimations filed under:

- i) SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.
- ii) SEBI (Prohibition of Insider Trading) Regulations, 2015.
- iii) 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.

6. Responsibility of Documents /Records

Functional / Departmental Heads shall ensure storage and retrieval of the Documents / Records of their respective areas in consultation of their reporting heads.

7. Review of Policy

This Policy shall be subject to review, if necessary. Any change / amendments in applicable statutes with regard to maintenance and preservations of documents and records shall be deemed to be covered in this policy without any review. Any change / amendments to this policy shall be approved by the Chairman and / or the Company Secretary.

The Policy shall come into force from December 1, 2015.