

SUNSHINE CAPITAL LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

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OTHERS:-

- 1. ANNEXURE 1**
- 2. ANNEXURE 2**

I. LEGAL FRAMEWORK :

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 SUNSHINE CAPITAL LIMITED is required to formulate a policy for “Preservation of Documents” in compliance with the requirements of the Listing Regulations.

Effective Date: This Policy is effective from 1st December, 2015.

II. DEFINITIONS:

- a. **“Board of Directors or Board”** shall mean the Board of Directors SUNSHINE CAPITAL LIMITED, as constituted from time to time.
- b. **“Company”** shall mean “SUNSHINE CAPITAL LIMITED”.
- c. **“Documents”** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- d. **“Listing Regulations”** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- e. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- f. **“Applicable Law”** means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs & other Statutory authorities under which the preservation of the Documents has been prescribed.

III. OBJECTIVES:

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

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 electronic mode.

IV. 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.

V. 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.

VI. DESTRUCTION OF DOCUMENTS:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode after the approval by the Board or any other authorized person or any other authority as required under the Applicable Law pursuant to which the documents have been preserved. The 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.

VII. COMMUNICATION AND DISSEMINATION OF THE POLICY:

The copy of this policy shall be posted on the web-site of the Company for all the employees and directors of the Company.

VIII. AMENDMENTS:

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

ANNEXURE 1

Documents whose preservation shall be permanent in nature:

| S. No. | Nature of Documents |
|---------------|--|
| 1. | Corporate records (Certificate of Incorporation, Memorandum & Articles of Associations) |
| 2. | Registration Certificates, Licenses, Permits & Statutory Approvals |
| 3. | Statutory Registers required under applicable laws |
| 4. | Audited financial statements |
| 5. | Minutes of General Meeting |
| 6. | Minutes of Board Meeting |
| 7. | Minutes of various Committee Meetings |
| 8. | Material Agreements/Contracts |
| 9. | Orders issued by Courts/Statutory bodies |
| 10. | Investment Documents/proofs including certificates etc. |
| 11. | Annual Information Returns under Tax laws |
| 12. | General Ledger |
| 13. | Court Orders |
| 14. | Original Purchase/Sale Deeds |
| 15. | Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time. |

ANNEXURE 2

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

| S. No. | Nature of Document |
|---------------|--|
| 1. | Books of Accounts |
| 2. | Annual Return(s) |
| 3. | Accounts Payable & Receivables ledgers & Schedules |
| 4. | Personnel Documents |
| 5. | Insurance Policies/ Claims under various policies |
| 6. | Correspondences with Departments/shareholders |
| 7. | Non-Statutory Registers/Documents |
| 8. | Sales Tax & Service Tax records |
| 9. | Cost Records |
| 10. | Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time. |