

SANGAM (INDIA) LIMITED

**POLICY FOR PRESERVATION OF
DOCUMENTS**

1. INTRODUCTION:

A company is required to maintain certain documents, registers and records. There are some other registers and records, the maintenance of which are not statutorily required but is essential for the smooth, efficient and systematic functioning of the company.

This Policy seeks to prescribe a set of principles in relation to the preservation, archival & destruction of various documents, registers and records as required to be maintained by Info Edge (India) Ltd. in compliance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations') and the applicable provisions of the Companies Act, 2013.

This policy has been amended with the approval of the Board of Directors on 28th May, 2019 and shall be effective from the same date.

2. PURPOSE OF THE POLICY:

Regulation 9 of the Listing Regulations mandates that a listed entity shall have 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.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Besides the above, as per applicable provisions of Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013

3. PRESERVATION OF DOCUMENTS:

Documents and Records of the Company required to be maintained under the Listing Agreement and Companies Act, 2013 shall be classified in following categories as below:

- 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. DESTRUCTION OF DOCUMENTS:

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

This applies to both Physical and Electronic Documents.

5. RESPONSIBILITY:

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

6. MODE OF PRESERVATION:

Records/documents may be preserved either physically or in electronic form.

7. AMEDEMMENT OF THE POLICY:

This policy may be amended, suspended or rescinded subject to the approval of Board of Directors, from time to time in line with any statutory enactment or amendment thereto.



Annexure-1

Documents whose preservation shall be permanent in nature:

S. No	Nature of Documents
1.	Copies of all documents and information as originally filed relating to incorporation of the Company.
2.	Statutory Registers required under applicable laws
3.	Share certificate forms and related books and documents – Disputed cases
4.	Minutes of General Meeting/resolutions passed by postal ballot, Board Meetings, Committee Meetings and resolutions passed by circulation.
5.	Statutory Forms and disclosure
6.	Register and Index of Members
7.	Scrutinizers Reports
8.	Common Seal
9.	Attendance Register of General Meetings, Board and committee Meetings
10.	Material Agreements
11.	Certificates issued by Registrar of Companies, Any court order/CLB/NCLT order etc.
12.	Annual Reports
13.	Auditors reports received from Statutory Auditors/Secretarial Auditors/Internal Auditors.
14.	Copy of Memorandum & Articles of Association
15.	Disclosures received by the company under the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.
16.	Documents to be filed with Registrar of Companies under Companies Act, 2013/1956.



Annexure- 2

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

S. No	Nature of Documents
1.	Books of Accounts
2.	Annual Returns
3.	Board Agenda and supporting documents
4.	Office copies of Notice of Board Meetings, General Meetings and Committee Meetings, Notes on Agenda and other related papers
5.	All notices pertaining to disclosure of interest of directors
6.	Instruments creating a charge or modification
7.	Attendance slips for Annual General Meeting/ Extra Ordinary General meeting
8.	Dividend Payment Records
9.	All documents required to be filed under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
10.	Any other register /documents required by any law, for the time being in force.

