



POLICY ON PRESERVATION OF DOCUMENT AND
ARCHIVAL OF DOCUMENTS

Approved by Board of Directors at their meeting held on 17/05/2024

For SUBAM PAPERS LIMITED

MANAGING DIRECTOR

SUBAM PAPERS LIMITED

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1. PREAMBLE

The Securities and Exchange Board of India (SEBI) has issued the Securities and Exchange Board of India ((Listing Obligations and Disclosure Requirements) Regulations, 2015 (“ SEBI LODR”) which have come into force from 1st December 2015.

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 documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes 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 Subam Papers Limited (“Subam” / “the Company”) has adopted the Policy for Preservation of Documents.

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

- “**Act**” means the Companies Act, 2013, Rules framed there under and any Amendments thereto.
- “**Applicable Law**” means any law, rules, circulars, guidelines or standards under which the preservation of the Documents has been prescribed.
- “**Authorised Person**” means any person duly authorised by Managing Director.
- “**Board**” means the Board of directors of the Company or its Committee.
- “**Books of Account**” as per Section 2(13) of the Companies Act 2013 includes records maintained in respect of—
 - (i) All sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place;
 - (ii) All sales and purchases of goods and services by the company;
 - (iii) The assets and liabilities of the company; and
 - (iv) The items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section;

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- **“Company”** means Subam Papers Limited
- **“Current Document(s)”** means any Document that has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- **“Document”** as per section 2(36) of the Companies Act 2013 includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, 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.
- **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- **“Preservation”** means to keep in good order and to prevent from being damaged or destroyed.
- **“Register”** means documents and records required to be maintained under:
 - a. The Companies Act 2013 and Rules there under
 - b. SEBI Regulations
 - c. Secretarial Standards
 - d. Any other law for the time being in force
- **“Records”** means documentary evidence of past events or transactions.
- **“Regulations”** means the Securities Exchange Board of India (Listing obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

4. COVERAGE

This Policy is intended to guide the Company and its officer on maintenance of any Documents, their preservation and disposal.

5. SCOPE

These guidelines will be valid for determining the preservation period for to all the documents, in electronic or physical form, and will be applicable to all the locations of the Company

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6. PRESERVATION POLICY

The preservation of Documents shall be done in the following manner:

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period prescribed by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is covered under the definition of current documents.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I.

7. MODE OF PRESERVATION

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

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

8. DOCUMENTS TO BE MADE AVAILABLE ON THE WEBSITE OF THE COMPANY AS REQUIRED BY THE COMPANIES ACT, 2013 AND THE LISTING REGULATIONS

8.1 As required under the Listing Regulations, the Company shall maintain a functional website containing -

- ✓ the basic information about the Company
- ✓ all Information and/or documents as specified in the applicable provisions of the Companies Act, 2013,
- ✓ all Information and/or documents as specified in Regulation 46 (2) of the Listing Regulations,
- ✓ all Information and/or documents as mentioned in Regulation 30 of the Listing Regulations on Material Events,
- ✓ all other Information and/or documents as required under the Listing Regulations,

8.2 The Company shall ensure that the contents of the website are correct.

8.3 The Company shall update any change in the content of its website within two working days from the date of such change in content.

8.4 Information and/ or Documents that need to be made available under Regulation 30 of the Listing Regulations shall be made available on the website simultaneously with disclosure to Stock Exchanges.

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8.5 The information and/or documents uploaded on the website shall be available for the current financial year and for the preceding five financial years.

8.6 Information and/ or Documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz.

- ◆ The information and/or documents may be arranged financial year-wise with further segregation into the four quarters of the financial year.
- ◆ All policies etc. or the information/ documents of a general nature can be clubbed together at one place.

9. ARCHIVAL OF DOCUMENTS

Documents maintained/preserved by the Company, as mentioned in the above paras, shall be maintained/ preserved in the following manner:

Documents maintained in physical form:

- a. All information and/or documents pertaining to the current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
- b. All documents pertaining to the period prior to the preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation as mentioned in the Annexures attached hereto. The said records should be also maintained in such a manner that their retrieval is easy and quick.

Documents maintained in electronic form:

- ◆ All documents pertaining to the current financial year and for the preceding financial year shall be maintained on server, and backup be maintained on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.
- ◆ Back up of all documents pertaining to the period prior to the preceding financial year shall also be maintained on server in good condition at least up to the minimum period specified for their maintenance / preservation. The said records should be also maintained in such a manner that their retrieval is easy and quick.

Documents made available on the website of the company:

After the expiry of time mentioned in Clause 8.5 of this policy (i.e. five financial years preceding the current financial year), the information and/or document shall be removed from the main website. The Backup of said information and/or document, which is removed from the main website, shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years, the backup may be permanently removed from the server.

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10. DISPOSAL OF REGISTERS/DOCUMENTS

The registers/documents mentioned above may be destroyed in accordance with the provisions contained in the Act and the SEBI Laws after approval of the Board and in the presence of the Company Secretary and the CFO.

The Board shall review, at least once in every three years, the list of documents that may be destroyed.

The Company shall maintain a Register of Records and Documents Destroyed, containing the particulars of the documents destroyed, the year to which it pertains, mode of destruction etc., each entry in this register shall be verified by the Company Secretary and countersigned by the CFO.

The concerned employee shall be responsible for taking in to account the potential impact on preservation/destruction of the documents in their work area and their decision to retain/preserve/destroy documents pertaining to their area of work.

11. EXCLUSION

Documents/records in respect of which any investigation/enquiry is pending, or in respect of which any legal proceeding is pending, or which is part of any legal dispute, are not covered under this policy.

12. DISCLOSURE

This Policy shall be placed on the website of the Company.

13. REVIEW

The policy has been approved by the Board of Directors of the Company. The Board, however, may review this policy as and when it deems appropriate. This policy is being formulated keeping in mind the applicable laws, rules, regulations and standards in India. If there is an amendment in such laws, rules, regulations and standards, allowing standards, then this Policy shall be deemed to have been amended to the extent of such amendment. Also, if due to subsequent amendment in the laws, this Policy or any part hereof becomes inconsistent with the law, the provisions of law shall prevail and this Policy shall be deemed to be amended to that extent.

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ANNEXURE - 1

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

SL NO	PARTICULARS
1.	Documents and information filed with ROC for Incorporation of the Company
2.	Common seal, certificate of incorporation and certificate of change of name, if any)
3.	Certificate for commencement of business, if any
4.	Memorandum of Association and Articles of Association as amended from time to time
5.	Agreements made by the Company with the Stock Exchanges and Depositories, etc.
6.	Minutes Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013 and the Regulation
7.	Cancelled Share certificates
8.	Licenses, Certificate and permissions obtained from any statutory authority
9.	Order from Courts and any other regulatory authorities
10.	Statutory registers required to be maintained under various applicable laws
11.	Statutory forms except for routine compliance
12.	Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
13.	Policies of the Company framed under the Companies Act, 2013 and various regulations from time to time.
14.	Any other documents as may be required to be maintained in terms of applicable law(s) and preserved from time to time

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ANNEXURE – 2

DOCUMENTS WHOSE PRESERVATION IS NOT PERMANENT IN NATURE

SL NO	PARTICULARS	Preservation Period
1.	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
2.	Attendance Register of Board/General Meeting	8 years
3.	Income tax papers	8 years from the end of Financial Year or completion of assessment under income tax, whichever is later
4.	Notices of General Meetings/ other such meetings and supporting documents all other	8 years from the date of meeting
5.	Employees Information Records	8 years after resignation/ separation
6.	Disclosure of interest by the Directors	8 Years
7.	Instrument creating a charge or modification	8 Years
8.	Books of accounts and financial statements etc.	8 Years
9.	Any other important documents including tax filling and papers, project documents and any other such documents and papers.	8 Years
10.	Scrutinizer's report	8 Years

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MANAGING DIRECTOR