

SHREE REFRIGERATIONS LIMITED

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

1. BACKGROUND

- 1.1. Shree Refrigerations Limited (**‘Company’**) is a public limited company incorporated in India. As a listed entity it is guided by various legal and regulatory requirements, including those outlined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**‘SEBI Regulations’**). The SEBI Regulations *inter alia* mandate listed companies to have a policy for the preservation and archival of documents, approved by their board of directors. Shree Refrigerations Limited, in line with its regulatory obligations, has adopted a Policy on Preservation & Archival of Documents (**‘Policy’**) to classify and maintain various records and registers crucial for business continuity and compliance. This Policy ensures the preservation of documents either permanently or for specific periods, as required by law. By adhering to the SEBI Regulations, the Company demonstrates its commitment to transparency, governance, and regulatory compliance in its operations as a listed entity.
- 1.2. Further, Regulation 9 of the SEBI Regulations mandates every listed company to have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories:
- a) documents whose preservation shall be permanent in nature; and
 - b) documents with preservation period of not less than eight years after completion of the relevant transactions.
- 1.3. Further, Regulation 30 (8) of the SEBI Regulations requires the listed entity to disclose on its website all such events or information which has been disclosed to stock exchange(s) under the said regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.
- 1.4. Therefore, this Policy is formulated to comply with the said regulations. The Board of Directors of the Company have adopted this Policy at its meeting held on 08th June 2024.



2. OBJECTIVE OF THE POLICY

The objective of this Policy is to classify various documents, records and registers of the Company for the purpose of Maintenance, Preservation and archiving, in compliance with the SEBI Regulations.

3. DEFINITIONS

3.1. **“Board”** shall mean the Board of Directors of the Company as maybe appointed from time to time.

3.2. **“Document(s)”** refers to papers, notes, agreements, records, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in Electronic Form received or kept in pursuance of any applicable law for and does not include multiple or identical copies.

3.3. **“Electronic Form”** means on any 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.

3.4. **“Maintenance”** means keeping Documents, either physically or in Electronic Form.

3.5. **“Preservation”** means to keep in good order and to prevent from being altered, damaged, or destroyed.

3.6. **“SEBI”** means the Securities and Exchange Board of India.

4. CLASSIFICATION & PRESERVATION OF DOCUMENTS

4.1. The Company shall in accordance with the applicable provisions of the SEBI Regulations preserve all its Documents which may be maintained in physical or electronic mode. All the Documents shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.



4.2. In accordance with Regulation 9 of the SEBI Regulations, the Company has classified the preservation of documents to be done in the following manner:

4.2.1. Documents that need to be preserved and retained permanently- an indicative list of which is appended as Annexure A to this Policy.

4.2.2. Documents that need to be preserved and retained for a period of 8 years - an indicative list of which is appended as Annexure B to this Policy.

5. ARCHIVAL OF DOCUMENTS

In accordance with Regulation 30 (8) of the SEBI Regulations, copies of all material disclosures made to the stock exchanges under Regulation 30 of the LODR Regulations shall be hosted on the website of the Company for a minimum period of 5 years. After a period of 5 years from the date of filing the records or documents with the stock exchanges, the copies of such records or documents shall be archived from the website of the Company for a period of 3 years.

6. MAINTENANCE OF DOCUMENTS

The responsibility of maintaining the records would be with the concerned departments within the Company or as decided by the Board. Records will be maintained for the periods stipulated in the concerned legislation, after which they may be destroyed in the manner provided in this Policy. The maintenance of the documents will be undertaken in a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity or accessibility of the documents.

7. DISPOSAL OF RECORDS

7.1 After the expiry of the statutory retention period, subject to any statutory procedure stipulated in relation to destruction of records, the preserved documents may be destroyed by the concerned department that has the responsibility of maintaining such records or as decided by the Board, unless required to be preserved for a specific purpose, such as ongoing litigation or regulatory directive.

7.2 Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.



7.3 Documents may be destroyed by recycling non-confidential paper records, shredding or otherwise rendering unreadable confidential paper records: or deleting or destroying electronically stored data.

7.4. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records which shall be maintained by the Company in the format prescribed by the Board. The entries in the Register shall be authenticated by the concerned department head or the person authorised by the Board in the said regard.

8. RESPONSIBILITIES:

8.1 Employees: Ensure that documents are managed in accordance with this policy and report any issues related to document preservation and archival.

8.2 Department Heads: Oversee the implementation of this policy within their departments and ensure compliance with the retention schedule.

8.3 Records Management Team: Develop, implement, and maintain the document retention schedule, provide training, and support, and conduct periodic audits to ensure policy compliance.

9. TRAINING AND AWARENESS:

9.1 Regular training sessions will be conducted to ensure employees are aware of their responsibilities regarding document preservation and archival.

9.2 Training materials and resources will be provided to support compliance with this policy.

10. COMPLIANCE AND AUDIT:

10.1 Compliance with this policy will be monitored through regular audits and reviews.

10.2 Any non-compliance or issues identified during audits will be addressed promptly, and corrective actions will be implemented.

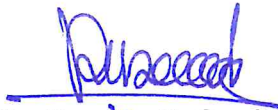


11. AMENDMENT

The Board of Directors may review and amend this Policy as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant statutory authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

For and on behalf of

**The Board of Directors
Shree Refrigerations Limited**



**Mr. Ravalhath Gopinath Shende
Shende
Managing Director
DIN No. 02028020**



**Mrs. Rajashri Ravalnath

Directors
DIN No. 02028006**



Place: Karad

Date: 8th June 2024

SHREE REFRIGERATIONS LIMITED

Plot No.131/1+2, Mouje Virawade, Ogalewadi
Karad-415105 Maharashtra, India
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CIN: U2919PN2006PLC128377|GST NO:27AAJCS9377A1Z1

Annexure A

Indicative List of Documents to be Maintained Permanently

1. Incorporation Documents
2. Memorandum of Association and the Articles of Association of the Company
3. Minutes of General Meetings, Board Meetings, and various committee meetings
4. Register of Members along with Index
5. Foreign Register of Members, if any
6. Register of loans, guarantee, security, and acquisition made by the Company
7. Register of investments not held in its own name by the Company, if any
8. Register of contracts with related parties and contracts and bodies in which directors are interested
9. Register of Charges
10. Registers of renewed and duplicate share certificates
11. Register of Directors and Key Managerial Personnel
12. Merger Order(s) issued by Hon'ble High Court/National Company Law Tribunal, if any
13. Approvals and Product Registration & licenses received from statutory authorities, Central & State Government(s)
14. Intellectual Property Documents including Copyrights, Trademarks, Patents, and Industrial Designs owned by the Company
15. Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.



Annexure B

Indicative List of Documents to be Maintained for at least Eight Financial Years

1. Books of accounts and financial statements
2. Register of Debenture holders or Register for any other Securities issued by the Company
3. Annual Returns
4. E-forms filed with the Registrar of Companies
5. Disclosure of Interest received from the Directors
6. Attendance Registers, Notices, Agenda, and related papers of all meetings
7. Instrument creating or modifying a Charge
8. Changes to the Memorandum of Association and the Articles of Association
9. Register of deposits accepted or renewed
10. Tax Records including documents concerning tax assessment, filings, proof of deductions, tax returns, and appeals
11. Employment/Personnel Records for eight years post-employment cessation
12. Relevant marketing and sales documents
13. Legal documents like contracts, legal opinions, pleadings, court orders, judgments, and property-related documents
14. Register of Fixed Assets.
15. Register of Proxies
16. Attendance slip of GM
17. Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

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