

**POLICY FOR PRESERVATION OF
DOCUMENT
&
ARCHIVAL POLICY**

Custodian : Managing Director

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1. PREFACE

Documents and Records in whatever form is an essential and significant part of the Company's resources. Documents and Records are a basic tool of administration. They are the means by which operational processes and functions are performed.

Securities and Exchange Board of India, has vide its Notification dated 02nd September, 2015, introduced the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with effect from 01st December, 2015, whereby, every Company needs to execute a fresh listing agreement with such stock exchange within six months of the date of notification of these Regulations. Regulation 9 of Chapter III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, requires the Company to frame a policy on preservation of documents. Further, Regulation 30(8) requires the Company to frame a Policy on website disclosure and archival of such disclosure.

In compliance to the aforesaid Regulations, this Policy is formulated to define a process for preservation of documents and records and to further develop a guideline for archival of such documents, including those which are maintained in electronic form and are disclosed on the website of the Company. In other words, the Policy further encompasses the manner of archival of the documents which have been disclosed on the website of the Company for the time frame prescribed in various Regulations.

The Board of Directors (the “ **Board** ”) of SIGMA SOLVE LIMITED (the “ **Company** ”) has adopted this Policy (“ **The Policy** ”) for preservation of Documents / Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “ **the Documents** ”) and Archival of various information / Document posted on the website of the Company.

2. OBJECTIVE OF THE POLICY AND SCOPE

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately preserved, protected and if required, destroyed as per the statutory requirements after following the due process. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

For the purpose of these instructions, Document shall include all information in whatever form it may be stored e.g. hard copies, electronic documents, computer disc, mails, etc.

All the Words and expressions used in this Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the SEBI's LODR, 2015 and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars made/issued thereunder, as amended from time to time .

3. ADMINISTRATION

The Documents of the Company shall be classified into following categories based on period of preservation-

- a) documents whose preservation shall be permanent in nature **Schedule A** ;
- b) documents with preservation period of not less than eight years after completion of the relevant transactions **Schedule B**;
- c) Miscellaneous Documents

Documents specified in clauses (a), (b) and (c) above may be kept in electronic mode.

Schedule A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The list of Documents is indicative list and shall not be construed to be exclusive. Company Secretary

cum Compliance Officer of the Company (“ **CS**”) shall be in- charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator under the supervision / guidance of the Board of Directors is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy. Notwithstanding anything contained in this policy, if any document is required to be maintained and preserved under any Act or law for the time being in force, then such document shall be maintained and preserved as per the provisions of the particular Act or law.

4. PROCEDURE FOR DISPOSAL OF DOCUMENTS

The Documents of the Company which are no longer useful may be destroyed with the permission of Administrator and after following the due process as mentioned herein. The Administrator will confirm from respective departmental head about the destruction of the records which are no longer required. Once the Departmental head confirms for destruction of the document, the administrator shall confirm the same from a Committee comprising of Chief Financial officer and Business Unit Heads.

5. SUSPENSION IN THE EVENT OF LITIGATION

Notwithstanding any other provision which may provide for the destruction of a document, upon receipt of a notice or claim or dispute concerning a project or a matter, this retention policy is suspended for any documents concerning that project or matter.

6. MORE INFORMATION

The definition of “**Document**” is to be construed broadly and includes any recorded information in any format which is required to be preserved / maintained under any Act / law.

7. ARCHIVAL POLICY

The Company shall ensure that all the statutory information / document as mentioned in SEBI LODR, 2015 disclosed on the Company's website is maintained live for a period of 5 years and then in archive section of the website.

8. POLICY REVIEW AND BOARD'S APPROVAL

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications.

SCHEDULE A

Documents / Record whose preservation shall be permanent in nature

- 1 Certificate of incorporation
- 2 Memorandum and Articles of Association
- 3 Certificate of Commencement of Business
- 4 Agreements made by the Company with Stock Exchanges, Depositories, etc.
- 5 Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
- 6 Register and Index of Members, debenture-holders, if any or other security holders, if any
- 7 Register of Contracts, if any, as per Companies Act, 2013
- 8 Register of Charges, if any, as per Companies Act, 2013
- 9 Register of Investments, if any, as per Companies Act, 2013
- 10 Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
- 11 Authorization / licenses, if any, obtained from any statutory authority
- 12 Policies of the Company framed under various regulations
- 13 Certificates obtained from various statutory authorities
- 14 Such other records as may be required under any law from time to time

SCHEDULE B

Documents / Record to be preserved for a minimum period of eight years

- 1 Instrument creating charge or modification (from the date of satisfaction of charge), if any, as per Companies Act, 2013
- 2 Annual Returns as per Companies Act, 2013
- 3 Register of Deposits, if any, as per Companies Act, 2013
- 4 Register of Allotment (from the date of each allotment) as per Companies Act, 2013
- 5 Annual financial statements including: - Annual accounts - Directors report - Auditors report
- 6 Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013
- 7 Income Tax Returns filed under Income Tax Act, 1961
- 8 All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
- 9 Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
- 10 Copy of newspaper advertisement or publications
- 11 Compliance Reports received from any statutory authority
- 12 The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
- 13 Disclosure/Return filed under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015
- 14 Records, if any, relating to Court Cases/Civil Suits/Arbitration Cases.
- 15 Register of Inter Corporate Loans and Investments, if any, as per the Companies, 2013
- 16 Forms and Returns filed with MCA/RBI or with any other statutory Authority