



SIMMONDS MARSHALL LIMITED

Regd.office & Factory : Plot No: C-4/1, Phase II, Chakan, MIDC Bhamboli, Khed Pune 410501, Maharashtra
+91-02135 683939/683900, sml@simmondsmarshall.com CIN: L29299PN1960PLC011645

RECORDS AND ARCHIVES MANAGEMENT POLICY (ARCHIVAL POLICY)

PREAMBLE:

This Policy for archival of disclosures to Stock Exchanges and preservation of documents has been prepared in compliance with Regulation 9 and 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Companies Act, 2013, and the rules framed thereunder as amended.

POLICY:

A) All disclosures made under Regulation 30 of the SEBI (Listing Regulations and Listing Obligations) Regulations 2015 by the Company to the Stock Exchanges, where equity shares of the Company are listed, shall be kept on the website of the Company for a period of five (5) years and thereafter the information would be archived under the heading "Past Events/Information" and would be retained on the website for such period as may be decided by the Chairman/ Managing Director.

B) All documents and records of the Company as categorized hereunder shall be preserved in a manner mentioned in Clause C:

i. All documents and records to be preserved for a period up to 8 years, after completion of the relevant transactions;

ii. All documents and records to be preserved for a period of more than 8 years, after completion of the relevant transactions;

iii. All documents and records to be preserved permanently;

The preservation period of any document will be determined on the basis of the respective law applicable to it.

C) All documents and records maintained in hard form shall be preserved / maintained for the required period at the respective Unit/Corporate Office(s) of the Company unless the applicable law requires it to be maintained at the Registered Office or at any other place, in which case the same shall be kept at such place.

D) The required documents, information, disclosures, notices, policies as provided under the SEBI Listing Regulations and the Companies Act, 2013, and the rules framed thereunder as amended, which are required to be disclosed on the website, shall be uploaded on the website of the Company. The website of the Company shall be reviewed on regular intervals for ensuring that all the above mentioned disclosures are available on the website of the Company, as required.



All documents and records maintained in soft form shall be preserved / maintained for the required period on the Company's server.

EFFECTIVE DATE:

This policy is effective from February 05, 2016.

AMENDMENT OF THE POLICY

Any subsequent amendment/modification in the Companies Act, 2013 or the Rules framed thereunder or the SEBI (LODR) Regulations and/or any other laws in this regard shall automatically apply to this Policy. The Board of Directors reserves its right to amend or modify the policy in whole or in part, at any time without assigning any reason whatsoever.

In the event of any inconsistency between this Policy and the applicable laws, the applicable laws will prevail.

REVISION HISTORY

S. No.	Date	Revision details
1.	February 05, 2016	The Board of Directors of the Company has formulated this Policy and approved the same at its meeting held on February 05, 2016.
2.	February 12, 2024	The Board of Directors modified/reviewed the policy at its meeting held on February 12, 2024.
3.	May 26, 2025	The policy has been amended in line with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.

