



SIMMONDS MARSHALL LIMITED

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Policy for Preservation of documents under SEBI Listing Regulations

1) Preamble:

This Policy is formulated in terms of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2) Documents whose preservation shall be permanent:

The following documents shall be preserved on permanent basis:

Sl. No.	Name of the Document	Regulation Reference
a)	Shareholding Pattern	31(1)(b)
b)	Quarterly Financial Results	33(3)(a)
c)	Annual Financial Results	33(3)(d)
d)	Annual Report	34(1)
e)	Shareholding Pattern in case of Capital Restructuring	34(1)(c)
f)	Voting Results by Shareholders	41(3)
g)	Draft Scheme of Arrangement	37(2)
h)	Yearly Disclosure of shareholding of Promoters	30(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011

3) Preservation of Documents for 8 years:

The following Documents shall be preserved for 8 years:

Sl. No.	Name of the Document	Regulation Reference
a.	Statement under Grievance Redressal Mechanism	13(3)



b.	Corporate Governance Report	27(2)(a)
c.	Statement of deviation or variation in use of issue proceeds	32(1)
d.	Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI	7(3)
e.	Compliance Certificate w.r.t. Transfer or transmission or transposition of securities within 30 days	40(10)
f.	Listing Fees	14
g..	Intimation of appointment of Share Transfer Agent	7(5)
h.	In-principle approval prior to issue of securities	28(1)
i.	Prior Intimations of Board Meeting for financial Result	29(1)(a)
j.	Prior Intimations of Board Meeting for Buyback, voluntary delisting etc	29(1)(b), 29(1) (c), delisting etc 29(1)(d), 29(1) (e) and 29(1) (f)
k.	Prior Intimations of Board Meeting for alteration in nature of securities	29(3)
l.	Disclosure of Price Sensitive Information	30(6)
m.	Shareholding Pattern prior to listing of securities	31(1)(a)
n.	Record date or Date of closure of transfer books	42(2)
o.	Record date for declaring dividend and /or cash bonus	42(3)
p.	Change in name of listed entity	45(3)
q.	Disclosure of information or events	30
r.	Reconciliation of Share Capital Audit Report	Regulation 76 of SEBI (Depositories and Participants) Regulations, 1996
s.	Disclosures under Code of Internal Procedures And Conduct For Regulating, Monitoring And Reporting Of Trading By Insiders	10 (1)

4) Preservation of Documents:

The documents specified in Item Nos. 2 & 3 shall be kept in electronic mode.

EFFECTIVE DATE:

This policy is approved by the Board of Directors at its meeting held on February 5, 2016 and modified/reviewed on February 12, 2024.

