



SIMMONDS MARSHALL LIMITED

Regd.office & Factory : Plot No: C-4/1, Phase II, Chakan, MIDC Bhamboli, Khed Pune 410501, Maharashtra
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POLICY FOR PRESERVATION OF DOCUMENTS

1) Preamble:

This Policy is formulated in terms of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Companies Act, 2013, which requires every listed entity to formulate and make available on its website, the Preservation of Documents.

The documents and records shall be preserved as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the SEBI Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to- time.

Where the documents / records of the Company are maintained by any external agency like the Registrar and Share Transfer agents, such an agency shall ensure the adoption of this policy for the preservation of the documents of the Company.

2) Documents whose preservation shall be permanent:

The following documents shall be preserved on permanent basis:

- Registration certificate from the Reserve Bank of India.
- Certificate of Incorporation.
- The Memorandum of Association and the Articles of Association of the Company (including amendments thereto).
- Attendance registers, notices, agenda, notes on agenda and other related papers, and minutes of general meetings, board meetings and various committee meetings.
- Register of members for various securities of the Company along with index.
- Foreign register of members, if any.
- Register of loans, guarantee, security and acquisition, if any, made by the company.
- Register of investments not held in its own name by the company, if any.
- Register of contracts with related party and contracts and Bodies etc. in which directors are interested.
- Register of charges.
- Registers of Renewed and duplicate share certificates.
- Register of Directors and KMP.
- Register of Debenture holders (including foreign register of debentures), if any or register for any other securities issued by the Company.
- annual audit Reports and financial statements.
- Material agreements/ contracts.
- Order issued by courts/statutory bodies.



- Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

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	44 (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 financial years:

The following Documents shall be preserved for Eight (8) financial years:

- Books of account together with the vouchers relevant to any entry in such books of account
- Copies of all annual reports and annual returns
- Disclosure of Interest received from the directors of the Company in the manner prescribed
- Instrument creating a charge or modifying a charge, if any
- Register of deposits accepted or renewed, if any
- Correspondence with department/shareholders
- Non-Statutory registers/documents
- Certificates surrendered to a Company
- Press releases and publicly filed documents along with all documents filed with the stock exchanges
- Correspondences with departments/shareholders
- Employment records/personnel documents that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment, such as actions taken against the personnel.
- Relevant marketing and sales documents
- Legal documents and intellectual property records relating to the development and protection of the intellectual property rights
- Insurance policies of the Company
- Original lease agreements (provided there is no dispute / claim / litigation is pending. If any such dispute persists, it should be preserved till the dispute is settled / closed)
- Investment records (with respect to investments made in the normal course of business)



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 Results	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	76 of SEBI (Depositories And Participants) Regulations, 2018
s	Disclosures under Code of Internal Procedures And Conduct For Regulating, Monitoring And Reporting Of Trading By Insiders	10 (1)

4) Mode of Maintenance:

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

5) Destruction of documents:

Documents or records that are no longer required, or have satisfied their required periods of retention, shall be reviewed by the respective departments and accordingly, if required, appropriate actions shall be taken to destroy those documents or records unless there are any litigations/ assessments pending and may be considered necessary for preservation for a longer



period. The need for destruction of the documents so preserved shall require the approval of the Chairman and Managing Director and/ or Whole- Time Director.

6) Review / Amendments to Policy:

The Policy would be reviewed on an annual basis by the Board of Directors. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors.

However, the amended regulatory requirements will supersede the existing Policy till the time Policy is suitably amended.

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 has modified/ reviewed this policy at its meeting held on February 12, 2024
2.	May 26, 2025	The policy has been amended in line with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.

