



DOCUMENT PRESERVATION POLICY

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Dept CS-04 **Policy no.** SPFSL/Policy No.18/CS-04 **Approval date** 05.08.2024

Document Preservation Policy

[FRAMED UNDER REGULATION 9 AND 30(8) OF SEBI (LISTING OBLIGATIONS & DISCLOSURE REQUIREMENTS) REGULATIONS, 2015]

1. LEGAL FRAMEWORK

The Securities and Exchange Board of India (SEBI), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations). The Regulations came into force from December 1, 2015. In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Supra Pacific Financial Services Limited, (the Company) is required to formulate a policy for preservation of documents and in terms of Regulation 30(8) of the Listing Regulations; the Company is required to formulate an archival policy.

2. DEFINITIONS

“Board” shall mean the Board of Directors of Supra Pacific Financial Services Limited.

“Company” shall mean “Supra Pacific Financial Services Limited”.

“Documents” shall mean all papers, records, files, books, etc., and also include all kinds of electronic documents the like as required to be maintained under any law or regulation for the time being in force.

“Listing Regulations” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

“Preservation Period”: The time frame during which documents must be retained as required by law or company policy.

“Destruction:” The process of eliminating or obliterating documents so that information contained within them cannot be retrieved or reconstructed.

3. OBJECTIVE

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

- . Documents whose preservation shall be permanent in nature as given in **Annexure 1** attached to this Policy.
- . Documents with preservation period of not less than eight (8) years after completion of the relevant transactions as given in **Annexure 2** attached to this Policy.

Provided that the Company may keep the documents as specified above in electronic mode.

Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time.

Accordingly, this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

4. ARCHIVAL POLICY

In accordance with the provisions of the aforesaid Regulation, the Company shall ensure that all the information shall be hosted on the Company's Website (www.suprapacific.com) for a period of 5 years and thereafter the Backup of said information and/or document which is removed from the main website shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years the backup may be permanently removed from the server.

5. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

6. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

7. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

All documents are destroyed in a secure and timely manner after the expiration of their preservation period. This applies to all physical and electronic documents that have reached the end of their retention schedule.

SCOPE

All documents held by the organization, including but not limited to internal communications, financial records, and personal data subject to retention under applicable laws and regulations.

- 1. Identification:** Documents eligible for destruction must be identified by the department responsible for their retention.
- 2. Authorization:** Destruction of documents must be authorized by the department head or a designated official.
- 3. Methods of Destruction:**
 - o Physical documents shall be shredded or incinerated.
 - o Electronic documents shall be deleted and the storage media sanitized or destroyed.
- 4. Documentation:** A record of the destruction, including the method, date, and the individual responsible, must be maintained.
- 5. Compliance:** All destruction procedures must comply with relevant legal and regulatory requirements.

PROCEDURES

- 1. Review:** At the end of each fiscal year, the department head will review documents to identify those that have reached the end of their preservation period.
- 2. Approval:** The department head will approve the list of documents for destruction and forward it to the authorized personnel.
- 3. Execution:** Authorized personnel will carry out the destruction using approved methods and document the process.
- 4. Verification:** A random audit will be conducted annually to ensure compliance with the destruction policy.

8, COMMUNICATION AND DISSEMINATION OF THE POLICY

Copy of this policy circulated among all the Director of the Company and communicated the existence and contents of this policy to the employees. The new employees shall be informed about the policy.

AMENDMENTS

1. This policy may be amended from time to time to reflect changes in legal requirements or company procedures and in tune with regulator directions

This policy shall be posted at the Web site of the Company.

ENCL: ANNEXURES

ANNEXURE 1 DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

S.No	Nature of Document (s)
1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited financial statements
5.	Minutes of General Meeting
6.	Minutes of Board Meeting
7.	Minutes of various Committee Meetings
8.	Material Agreements/Contracts
9.	Orders issued by Courts/Statutory bodies
10.	Any other document as may be required to maintain permanently in terms of applicable laws

ANNEXURE 2 DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT (8) YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

S.No	Nature of Document (s)
1.	Books of Accounts
2.	Annual Return(s)
3.	Personnel Documents
4.	Insurance Policies/ Claims under various policies
5.	Correspondences with Departments/shareholders
6.	Non-Statutory Registers/Documents
7.	All Emails received from Internal and External Sources related to business issues
8.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time