



**SEAMEC LIMITED**

A member of the **MMG**

**POLICY ON PRESERVATION OF DOCUMENTS**

**UNDER REGULATION 9 AND 30(8) SEBI (LISTING OBLIGATIONS AND  
DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

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## **POLICY ON PRESERVATION OF DOCUMENTS:**

### **1. Preamble**

Pursuant to Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company is required to formulate a policy for “Preservation of Documents” required to be maintained in two categories as specified in the said regulation.

Further, Regulation 30(8) of Listing Regulations envisage that the Company is required to formulate an “Archival Policy” for disclosure of events/information to Stock Exchanges.

Documents and Records of the Company required to be maintained under the Listing Regulations shall be classified in two categories as below:

- a) Documents whose preservation shall be permanent in nature to be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;
- b) Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transaction, subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

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

### **2. Purpose of the Policy**

The purpose of this Policy is to ensure that all necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. 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.

### **3. Applicability and modes of Preservation:**

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

### **4. Preservation of Documents:**

Documents:

For the purposes of this policy the term “documents” shall mean as per the Companies Act, 2013 “Act” (including rules made thereunder), Securities and Exchange Board of India, 1992 and such other acts and regulations as may be applicable to a Listed entity, all the registers, forms, returns and other documents as required to be retained and preserved by the company in physical or electronic form as prescribed under the aforesaid acts and regulations that should be kept in the custody of the President Corporate Affairs, Operations and Company Secretary of the Company or any other person authorized by the Board for such purpose.

The two categories for preservation of documents are:

#### **I. DOCUMENTS TO BE PRESERVED PERMANENTLY**

##### **A) Companies Act, 2013:**

- |    |  |
|----|--|
| 1) | Memorandum and Articles of Association as amended from time to time. |
| 3) | Register of Directors and KMPs and the securities held by them.      |
| 4) | Register of Loans and Investments made by the Company.               |

5) Register and Index of Members.
6) Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots.
7) Resolutions passed by Circulation.
8) Various Forms and returns filed with the Authorities.
9) Audited Financial Statements.

**B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:**

1) Listing Agreement executed with the Exchanges.
2) Trading approval relating to listing of securities.
3) Offer documents for Public Issues and Private placement of securities filed with Securities and Exchange Board of India.

**C) Depositories Act:**

1) Confirmation of all Corporate Actions in respect of allotment of securities.
2) Intimation on allotment of International Securities Identification Numbers (ISIN) for securities issued.

**D) Others:**

**Register of Records and Documents destroyed.**

**II) Following documents shall be preserved and maintained for a period of 8 years from the date of its event, unless specified under any other any Act or rules, for a longer duration:**

**A) Companies Act 1956 / Companies Act, 2013:**

1) Register of Buy-back of Securities from the date of completion of buy-back
2) Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots
3) Register of Charges from the date of satisfaction of respective charge
4) Register of Debentures and Debenture Trust Deed from the date of its redemption
5) Books of Accounts including vouchers and bills
6) Annual Returns together with the Annexures

7) Register of Transfer and Transmission of shares / Debentures and other securities
8) Scrutinizer's Report on Postal Ballot and AGM
9) Documents relating to appointment of Managerial Personnel
10) Dividend reconciliation statement till the time the dividend is transferred to IEPF
11) Bank Statement & Investment Records

B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

1) All reports filed with the stock exchanges from time to time
2) All disclosure of various events and Press Releases
3) Intimations of Board Meetings

C) Documents filed with Stock Exchanges under SEBI Regulations:

1) SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011
2) SEBI (Prohibition of Insider Trading) Regulations, 2015
3) All disclosures and intimations filed under SEBI (Share Based Employee Benefit) Regulation, 2014 and SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines 1999.

D) Taxation, Legal and Insurance

1) Tax exemption on related documents
2) Payment Challans
3) Tax deducted at source records
4) Income Tax Records
5) Service Tax Records
6) Court Orders
7) Contracts, Agreements and Related correspondence
8) Legal Memoranda and Opinions including subject matter files
9) Litigation files

**5. Destruction of Documents:**

The documents that are mentioned herein in the Policy Annexure A which are not required to be maintained and preserved permanently may be destroyed after the expiry of the statutory retention period in such mode and under the instructions approved by the Function Heads duly approved by President Corporate Affairs Operations & Company Secretary. Any deviation to this will be approved by Managing Director, President Corporate Affairs Operations & Company Secretary and President & Chief Financial Officer of the Company.

**6. Archival Policy:**

All documents required as per Regulation 30 (8) of the Listing Regulation which are disclosed to NSE and BSE Limited will be uploaded on the Company's website and will be available on the website for a minimum period of 5 years.

**7. Policy on Review:**

This Policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to necessary approval of the Board of Directors.

**8. Amendment:**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit or from time to time and the decision of the Board in this respect shall be final and binding.

**9. Adherence of the Policy by the employees:**

The Company expects from its Responsible Officers to understand and fully comply with this Policy and schedules, provided however that if it is believed, or the Company informs otherwise.



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**10. Dissemination of the Policy:**

The approved Policy shall be uploaded on the Company's website.

**11. Board Approval:**

This Policy was approved by the Board of Directors in the Board Meeting dated May 19, 2016.

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