

SWAGTAM TRADING & SERVICES LIMITED

Regd. Office: R-489, GF-A, New Rajinder Nagar, New Delhi – 110060
Tel: 011-42475489 E-mail: swagtam1984@gmail.com Website: www.swagtam.com
CIN: L51909DL1984PLC289131

DOCUMENT PRESERVATION AND ARCHIVAL POLICY

1. Background

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations). These Regulations come into force from December 1, 2015. The Regulations mandate listed entities to formulate a Policy for preservation and archiving of documents.

2. Objective of the policy

The Company makes this Policy for Archival, Preservation and Disposal of Documents in compliance with the provisions of Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations) with the main objective to establish guidelines for the Company for preservation and archival of documents and orderly disposal of documents of the Company covered under this Policy.

3. Effective Date

This Policy is effective from the date of approval of the same by the Board of Directors of the Company.

4. Definition

“Act” shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“Board of Directors” or “Board” means the Board of Directors of the Company.

“Company” means ‘Swagtam Trading & Services Limited’.

“Document” means any register, record or other document mandatorily required to be maintained by the Company as per the provisions of the Companies Act, 2013 and the rules made thereunder, the Securities and Exchange Board of India Act, 1992 and the regulations issued by the Securities and Exchange Board of India (SEBI) including any statutory modification and amendments or re-enactments thereof or under any other law for the time being in force whether maintained physically or electronically.

“Listing agreement” shall mean the uniform listing agreement executed in pursuant to Securities and Exchange Board (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“Policy” means this Policy for Archive, Preservation and Disposal of Documents.

“Regulations” mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

“SEBI” means the Securities and Exchange Board of India.

“SEBI Regulations” means the regulations made by SEBI in accordance with the Securities and Exchange Board of India Act, 1992 (the SEBI Act).

Any other term not defined under these presents shall have the same meaning as defined in the Companies Act, 2013 or the rules made thereunder, the SEBI Act or the SEBI Regulations.

5. Applicability

This policy shall apply to all the documents that are required to be maintained and preserved under the applicable provisions of the Act, the SEBI Act, the SEBI Regulations and any other acts, rules and regulation for the time being in force.

6. Statement of Policy

All the documents required to be maintained by the Company are broadly categorized as:

- i) Statutory and Regulatory documents,
- ii) Other documents :
 - a) All the statutory and regulatory documents that are required to be maintained and preserved by the Company shall be maintained and preserved for such duration as may be specified by the relevant statute or regulation, as the case may be, governing the maintenance of the particular document;

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b) Other documents shall be preserved either permanently or for such period as may be specified by the company from time to time;

c) All the documents, records that are statutorily required to be hosted on the website of the Company as per SEBI regulations or other applicable law, shall be hosted on the website for a minimum period of five (5) years or for such, period as may be mentioned in the relevant law, whichever is longer and then the documents would be archived and show in Historic information column in the website of the Company.

7. Disposal or Destruction of the Documents

All the registers, records, documents, covered under this policy, may be destroyed after the expiration of the applicable preservation period and the list of registers, records, documents destroyed, in accordance with this policy, shall be placed before the Board for its information. Any disposal of registers, records, documents, which is not in accordance with this policy, shall be subject to prior approval of the Board.

8. Amendments

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.