



POLICY ON PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

Sonam Clock Limited

CIN: U33302GJ2001PLC039689

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Policy for Preservation of Documents

1. LEGALFRAMEWORK

Securities and Exchange Board of India (SEBI) on September 2, 2015 has Notified The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) Imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 and regulation 30(8) of the regulations being to formulate and put in place a policy for preservation of documents.

The Board of Directors of SONAM CLOCK LIMITED (“the Company”) is required to formulate a policy for “Preservation of Documents & Archival Policy” to comply with the requirements of Regulation 9 and regulation 30(8) of the Listing Regulations by passing resolution on 28th May, 2019.

This policy is intended to ensure compliance particularly with the listing regulations and the applicable provisions of companies act, 2013.

2. DEFINITIONS

A. “Board of Directors” or “Board” Board of Directors or Board shall mean the Board of Directors SONAM CLOCK LIMITED, as constituted from time to time.

B. “Company” Company shall mean “SONAM CLOCK LIMITED”.

C. “Documents” Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

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

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

A. The documents of a permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure-2) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years. Provided further that the Company may keep the documents as specified above in an electronic mode.

4. 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.

5. 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.

6. 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. This applies to both Physical and Electronic Documents.

Documents listed in **Annexure - II**, which no longer requires any preservation as per given schedule may be destroyed. The concerned departmental head instructs to destroy the documents which no longer require. The details of documents destroyed by the company shall be recorded in register for the disposal of records, to be kept by employees who are disposing of documents, entries in the registrar shall be verified by head of the department.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

8. MODE OF PRESERVATION

Records/Documents may be preserved either physical or electronic Forms. Dependent upon the need of respective Departments.

9. AUTHORITY TO MAKE AMENDMENTS IN POLICY AND REVIEW THE POLICY

Any director of company or company secretary of company is Authorized to make and review such alteration to this policy as consider appropriate and subject to the applicable laws including the provision of companies act 2013, and SEBI (Listing regulation) with as amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

ARCHIVAL POLICY

1. LEGAL FRAME WORK

Regulation 30(8) of the SEBI Listing Regulations requires every listed entity to make available an archival policy on its website. In this context, the following policy has been framed by the Board of Directors of the Company.

2. OBJECTIVES

Pursuant to Regulation 30(8) of the SEBI Listing Regulations, records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual, legal or regulatory requirements or for other purposes as may be set forth below. Records that are no longer required, or have satisfied their required periods of retention, shall be destroyed as per the procedure prescribed under law.

3. SCOPE

In line with the Company's Policy on Determination of Materiality of Events and as per the SEBI Listing Regulations, the Company shall disclose all such events to the Stock Exchanges and such disclosures shall be hosted on the website of the Company for a period of 5 years and thereafter the same shall be archived so as to be available for retrieval for a further period of three years by storing the same on suitable media. Thereafter the said information,

documents, records may be destroyed as per the policy on preservation of documents.

ANNEXURE -I

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

Sr. No.	Nature of Document(s)
1.	Memorandum and Articles of Association as amended from time to time
2.	Statutory Registers required under applicable laws
3.	Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots
4.	Licenses & Statutory Approvals
5.	Material Agreements/Contracts
6.	Listing Agreement executed with the Exchanges
7.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

ANNEXURE -II

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS UNLESS SPECIFIED UNDER ANY OTHER ANY ACT OR RULES, FOR A LONGER DURATION:

Sr. No.	Nature of Document(s)
1.	Books of Accounts
2.	Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots
3.	Personnel Records
4.	Non-Statutory Registers / Documents

** The Statute shall prevail if there is any contradiction between statute and Policy. If any matter which is not stated in the policy then company need to comply accordingly as mentioned in respective statute.*