

## **POLICY FOR PRESERVATION OF DOCUMENTS**

### **1. PREAMBLE**

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**SEBI LODR**") came into force from December 01, 2015. In accordance with Regulation 9 of the SEBI (LODR) Regulations the Board of Directors of **Sadhav Shipping Ltd** ("the Company") is required to frame a Policy for Preservation of Documents ("**Policy**") classifying them into two categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than eight years after completion of the relevant transactions.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval as well as authentication.

**This policy has been approved by the Board of Directors at its meeting held on October 17, 2023.**

### **2. OBJECT AND SCOPE**

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.

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. 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.

### **3. DEFINITIONS**

- a. "**Act**" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.
- b. "**Applicable Law**" means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA),

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#### Registered Office

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The Institute of Company Secretaries of India (ICSI) and other professional bodies under which the preservation of documents has been prescribed;

- c. **"Board" or "Board of Directors"** means the collective body of the Directors of the Company.
- d. **"Books of Accounts"** includes records maintained in respect of –
  - i. All sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place;
  - ii. All sales and purchases of goods and services by the Company;
  - iii. The assets and liabilities of the Company; and
  - iv. The items of cost as may be prescribed under section 148 of the Act in case the Company belongs to any class of companies specified under that section.
- e. **"Company", "This Company", "The Company"**, wherever occur in the policy shall mean **"Sadhav Shipping Limited"**.
- f. **"Current"** means running matter or whatever is at present in course of passage.
- g. **"Documents"** refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.
- h. **"Electronic Form"** means any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- i. **"Maintenance"** means keeping documents, either physically or in Electronic Form.
- j. **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.
- k. **"Register"** means a register maintained under the Companies Act, 2013 or the SEBI Act.

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Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

4. **Authenticity:**

Where a Document is being maintained both in physical form and Electronic form, the authenticity with reference to the physical form should be considered for every purpose. Conversion of the form in which the Documents are preserved.

5. **Conversion of the form in which the Documents are preserved**

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

6. **General Authorization & Responsibility**

The Policy shall be reviewed on a periodic basis and Chairman and Managing Director / Whole-Time Directors and Company Secretary are authorized jointly (by any two) to make such changes as may be deemed necessary or as warranted by law.

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

7. **PRESERVATION PERIOD**

The preservation period starts with the conclusion of the financial year, in which the document has been formed or the last entry was made; the preservation period of agreements starts with the end of the financial year in which the agreement period expires.

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For determining the preservation period, the records are categorized into following categories:

Sr. No.	Category & Description	Period of Preservation
1	Records/documents with short reference value – i.e. Records, which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc.	Less than 8 years
2	Records in proof of sending the following documents, in relation to Board Meetings, Committee Meetings , Circular Resolutions, General Meetings, Postal Ballot viz., Notices, Agenda and Notes on Agenda, Circular Resolutions including necessary papers, draft Minutes and signed Minutes and Delivery thereof.	At least 3 years
3	Records of the following maintained by the Company viz., <ul style="list-style-type: none"> <li>● Attendance Register of the Board and Committee Meetings.</li> <li>● Office Copies of Notices, Agenda, Notes on Agenda and other related papers of Board, Committee Meetings, Circular Resolutions and Office Copies of Notices, Scrutinizer’s Report and related papers of General Meetings, Postal Ballot, to be preserved in good order in</li> <li>● Physical or in electronic form.</li> </ul>	At least 8 financial years (and may be destroyed upon approval of the Board of Directors of the Company).  As long as they remain current or for 8 financial years, whichever is later (and may be destroyed upon approval of the Board of Directors of the Company)

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4	Records/documents required to be maintained as per statutory requirements and having higher reference value  i.e. records having contractual/legal implications, which need to be preserved for a prescribed periods per statutory requirement; and records, which need to be, preserved for a particular period according to Company's own reference needs.	Documents to be preserved for a period of 8 to 12 years
5	Records which will have a permanent value for the Company even after the expiry of legal preservation period.	Permanent
6	Records which are required for adducing evidence in judicial or quasi-judicial or other dispute redressal forums	Till the time the matters are finally disposed of.

Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi-judicial for a and other mediation and alternate dispute fora, industrial disputes, etc. are preserved according to specific needs and even beyond the prescribed period.

Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government/ Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

## 8. DESTRUCTION OF DOCUMENTS:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/ concerned Functional Director/ Head of the Department.

This applies to both physical and electronic documents.

## 9. 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.

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