



**SG MART**  
ONE MART. INFINITE POSSIBILITIES

**Document Retention and  
Archival Policy**

## **Background:**

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Regulations") have come into force from 1<sup>st</sup> December, 2015. The Listing Regulations mandate listed entities to formulate a Policy for preservation and archiving of documents. It is in this context the Board of Directors ("the Board") of SG Mart Limited (Formerly known as Kintech Renewables Limited) ("the Company") have adopted this Policy at its meeting held on 5<sup>th</sup> May, 2015, for Preservation of Documents & Archival.

## **Objective of the Policy**

The objective of this Policy is to (i) determine preservation period for records/documents based on their reference value and legal requirements and (ii) safe disposal/destruction of the documents in line with the statutory requirements pertaining to the same.

## **Scope**

It extends to all the departments of the Company.

## **Policy**

The corporate records of the Company are important assets. Corporate records include essentially all records, whether in physical or in electronic form which may be in the form of a memorandum, an e-mail, a contract or a case study, software database, registers, etc.

The law requires the Company to maintain certain types of records either permanently or for a specified period of time. Failure to retain the records could subject the employees and the Company to penalties and fines, cause the loss of rights, obstruct justice, adversely impact potential evidence in a lawsuit, invoke contempt of court provisions, or seriously disadvantage the Company in litigation as well as damage the reputation of the Company.

The documents/records shall always be preserved for a particular period in accordance with the statutory requirements applicable to them from time to time and Company's own information retrieval needs.

The Company expects from all the employees to fully comply with this Policy, provided that all employees should note the following general exception to any stated destruction schedule.

In case of change in the statutory requirements for preservation of documents, the Policy stands automatically revised and corresponding changes will be made in the Record Retention Schedule with the permission of the Board.

## **Policy for Preservation of Documents**

- (i) Documents and Records of the Company required to be maintained under the Listing Regulations or any other Act which may be applicable to Company from time to time shall be classified in two categories as below:
  - a) Documents whose preservation shall be permanent in nature shall 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 transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.
- (ii) The listing documents and records in physical form shall be in the custody of the Company Secretary.
- (iii) The Company may keep the listing documents and records as specified above in electronic mode.

## **Archival Policy**

The Company shall host on its website [www.sgmart.co.in](http://www.sgmart.co.in), information and documents which are required to be hosted as per the Companies Act, 2013 and Rules framed thereunder, SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (the "Regulations") and other applicable laws, Rules and Regulations.

The Company shall host the above information and documents on its website for a continuous period of five years from the date of hosting and thereafter same will be purged in the manner as may be decided by the Board.

## **Disposal of Records**

All the registers, records, documents, covered under this policy, may be destroyed after the expiration of the applicable preservation period and the Company shall maintain a register entering the details of destroyed documents and the entries made therein shall be authenticated by the Company Secretary or any other person as may be authorized by the Board for this purpose. The list of registers, records, documents destroyed, in accordance with this policy, shall be placed before the Board, within 4 months of such disposal, 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.

## **Compliance**

Failure to comply with this Preservation of Documents Policy may result in disciplinary action. Questions about this policy should be referred to Company Secretary.

## **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, in accordance with the applicable provisions of law.

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Approved & Adopted by the Board of Directors at its Meeting held on May 5, 2015 and subsequently amended at its Meeting held on October 29, 2015.