

POLICY FOR PRESERVATION OF DOCUMENTS

1. Introduction

SPA Capital Services Limited (“the Company”) believes in promoting a fair, transparent, ethical and professional work environment. This Policy aims to preserve Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”).

This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Policy shall come into effect from the date of the approval by the Board of Directors at Board Meeting.

2. Purpose of the Policy

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

- A. Documents whose preservation shall be permanent in nature ;
- B. Documents with a preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

3. Policy

3.1 Preservation of Documents

Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

i. THE DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently.

ii. DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years after completion of the relevant transactions shall be preserved accordingly.

iii. DOCUMENTS WITH PRESERVATION PERIOD OTHER THAN THOSE MENTIONED IN I) & II) ABOVE

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in i) & ii) above shall be preserved accordingly.

3.2 Archival of Documents mentioned in Clause 3.1

Documents mentioned in Clause 3.1 above shall be maintained/ preserved in the following manner:

Documents maintained in physical form:

- a. All information and/or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
- b. All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

Documents maintained in electronic form:

- a. All documents pertaining to current Financial year and for one preceding financial year shall be maintained on server and Backup be maintained at least every week on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.
- b. Back up of all documents pertaining to the period prior to one preceding financial year shall also be maintained on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

3.3 Destruction of documents

Any of the documents mentioned in clause 3.1 of this policy, which are not required to be maintained and preserved permanently shall be destroyed in the following manner:

a. **Documents maintained in physical form:**

- ✓ After the expiry of minimum period as mentioned above (or any further period decided by the company) for maintaining or preserving the document, the details of such documents shall be informed to the Company Secretary by the person responsible to maintain the said records, for destruction.
- ✓ The Company Secretary (for secretarial records), and the Chief Financial Officer (“CFO”) (for Books of Accounts) shall evaluate the need for further preservation and then give their approval for destruction if considered fit and proper.
- ✓ The person responsible to maintain the said records shall arrange to destroy the said records of the Company after obtaining the approval of company secretary / CFO, as the case may be.
- ✓ The Company Secretary/ CFO shall maintain a Register (Register for destruction of records) for recording the details of records of the Company so destroyed. The Company Secretary along with the person responsible and the person in whose presence the records are destroyed shall endorse the relevant entry in the Register for destruction of records/ documents.

b. **Documents maintained in electronic form:**

- ✓ After the expiry of minimum period as mentioned above (or any further period decided by the company) for maintaining or preserving the document, the details of such documents shall be informed to the Company Secretary by the person responsible to maintain the said records for destruction.
- ✓ The Company Secretary (for secretarial records), Chief Financial Officer (“CFO”) (for Books of Accounts) and the Departmental Heads for their respective Departments shall evaluate the need for further preservation and then give their approval for destruction if considered fit and proper.
- ✓ The person responsible to maintain the said records may arrange to destroy the backup of said records of the Company from the server after obtaining the approval of Company Secretary / CFO, as the case may be.
- ✓ The Company Secretary/ CFO shall maintain a Register (Register for destruction of records) for recording the details of records of the Company so destroyed. The Company Secretary along with the person responsible and the person in whose presence the records are destroyed shall endorse the relevant entry in the Register for destruction of records/ documents.

c. **Documents maintained in Archives (for documents made available on website):**

- ✓ After the expiry of 3 years from the time the information and/or document is transferred to the archival section and is lying as backup on the server, all back up information and/or documents may be permanently removed from the server, unless otherwise required to be maintained/ preserved by applicable laws.
- ✓ The person responsible to maintain the said records shall arrange to remove the said records of the Company after obtaining the approval of Chief Financial Officer, Company Secretary and the respective Departmental Heads.

- ✓ The Company Secretary shall maintain a Register (Register for destruction of records) for recording the details of backup records of the Company so removed from the server. The Company Secretary along with the person responsible and the person in whose presence the backup records are removed/ destroyed shall endorse the relevant entry in the Register for destruction of records/ documents.

AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

The Board of Directors may review this policy on an annual basis.