



SYSCO INDUSTRIES LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

INTRODUCTION

In terms of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations') the Company is required to formulate a policy on Preservation of Documents which is required to be maintained under the Listing Regulation.

In terms of Regulation 30(8) SEBI (Listing (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations') the Company is required to formulate an Archival policy for disclosure of all material events/ information of the Company specified in Schedule III of the Listing Regulation.

OBJECTIVE OF THE POLICY

As per Regulation 9 of SEBI (LODR) Regulations, 2015

The objective of this Policy is to classify the documents, records and registers of the Company which are required –

- to be preserved permanently and
- to be preserved for the period of not less than 8 years.

As per Regulation 30(8) of SEBI (LODR) Regulations, 2015

The listed entity shall disclose on its website all material events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

PRESERVATION OF DOCUMENTS

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and other rules, regulations as may be applicable to the Company from time to time.

Documents which are to be maintained permanently-

- a) The Memorandum of Association and Articles of Association and Certificate of Incorporation.
- b) Minutes of General Meetings, Board Meetings and various Committee Meetings.
- c) Register of Members along with index.
- d) Register of loans, guarantee, security and acquisition made by the Company.
- e) Register of investments not held in its own name by the Company, if any.
- f) Register of Directors and KMP.
- g) Register of Charge.
- h) Register of contracts with related party and contracts and Bodies etc. in which Directors are interested.
- i) Any other Registers as mandated under Companies Act, Secretarial Standards and any other rules as may be applicable to the Company from time to time.
- j) Agreement entered with Statutory Authorities and License issued by Regulatory Authorities.
- k) Intellectual Property Documents owned by the Company.
- l) Such other records as may be required under any law(s), from time to time.

Documents which are to be maintained for at least eight financial years-

- a) Annual Reports and Annual Returns of the Company.
- b) Books of accounts together with the vouchers relevant to any entry in such books of accounts.
- c) Disclosure to Stock Exchange, Registrar of Companies (MCA), Takeover Code, NSDL & CDSL.
- d) Approval received from Central Government, Registrar of Companies (MCA), SEBI, Stock Exchange
- e) Documents on which common seal of Company has been affixed
- f) Attendance Registers, Notice & Agenda of Board, General and Committee meeting
- g) Declaration given by directors under Section 184 & Section 164 of the Companies Act, 2013
- h) Declaration given by Independent Directors
- i) Instruments creating and modifying charges.
- j) Such other records as may be required under any law(s), from time to time.

ARCHIVAL POLICY

In line with Company's policy on determination of materiality of events and as per the Listing Regulation, the Company shall disclose all such events to the Stock Exchange and such disclosure shall be hosted on the website of the Company for a minimum period of 5 years from the date of the disclosure and same shall be archived from the website of the Company for a further period of 3 years. After the expiry of the statutory retention period, the preserved document may be destroyed.

MODE OF MAINTAINENCE

All the records shall be maintained under the prescribed formats, if any, as amended from time to time under the various rules and regulations either in physical or electronic form.

AMENDMENTS

This policy as amended from time to time shall be made available at the website of the Company. The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.