

**PICCADILY SUGAR AND ALLIED
INDUSTRIES LIMITED**

POLICY ON PRESERVATION OF DOCUMENTS

1. INTRODUCTION

In accordance with the Regulation 9 of Listing Regulations, the board of the Company, has adopted this Policy.

2. DEFINITION

- i. "Act" shall mean the Companies Act, 2013 and rules made thereunder, as amended.
- ii. "Board" shall mean the board of directors of the Company.
- iii. "Company" shall mean Piccadily Sugar and Allied Industries Limited.
- iv. "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.
- v. "Electronic Record(s)" shall mean the electronic record as defined under Section 2(1) (t) of the Information Technology Act, 2000.
- vi. "Listing Regulations" shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.
- vii. "Insider Trading Regulations" shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended.
- viii. "Policy" shall mean this policy on preservation of documents.
- ix. "Stock Exchange" shall mean a recognised stock exchange on which the securities of the Company are listed.

3. APPLICABILITY

This Policy applies to:

1. Documents whose preservation shall be permanent in nature; and
2. Documents with preservation period of not less than 8 years after completion of relevant transactions ("Temporary Documents")

All documents of the Company shall be preserved in accordance with this Policy. Any change in the governing law affecting the change in the period of preservation of documents shall prevail over this Policy.

4. POLICY

The following documents and information shall be preserved in the manner hereinafter stated:

A. DOCUMENTS AND INFORMATION THAT SHALL BE PRESERVED PERMANENTLY

- i. Registration Certificates.
- ii. Licenses & Statutory Approvals
- iii. Statutory Registers required under applicable laws
- iv. Audited Financial statements
- v. Minutes of General Meeting
- vi. Minutes of Board Meeting
- vii. Minutes of various Committee Meetings
- viii. Material Agreements/ Contracts
- ix. Orders Issued by Courts/ Statutory Bodies
- x. Investment Documents/ proofs including physical certificates etc.
- xi. Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

B. DOCUMENTS AND INFORMATION THAT SHALL BE PRESERVED FOR NOT LESS THAN 8 YEARS AFTER COMPLETION OF RELEVANT TRANSACTIONS

- i. Books of Accounts
- ii. Annual Returns
- iii. Personal Documents
- iv. Insurance Policies/ Claims under various policies
- v. Correspondences with Departments/ Shareholders
- vi. Non-statutory Registers/ Documents
- vii. Films, Videos, CD"s, DVD"s, Tapes etc.
- viii. Any other documents as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

5. COMMUNICATION OF THIS POLICY

The Policy shall be explained to all such employees, who have joined the Company, which the management may deem fit and directors as a part of the induction programme along with other HR related policies. For the existing employees/ directors of the Company, the concerned heads of department will apprise the respective employees reporting to them.

6. POLICY REVIEW AND AMENDMENTS

The Board reserves the power to review and amend this Policy from time to time. All provisions of this Policy would be subject to revision or amendment in accordance with applicable law. In case of any amendment(s), clarification(s), circular(s) etc. issued by any governmental, statutory or regulatory 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.