



SHALIMAR PRODUCTIONS LIMITED

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POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

*(Framed under Regulation 9 and Regulation 30(8) of SEBI (Listing Obligations
& Disclosure Requirements) Regulations, 2015)*



Background:

The Securities and Exchange Board of India ("SEBI"), through its notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"). These regulations mandate listed entities to establish policies for the preservation and archiving of documents in compliance with applicable laws.

Regulation 9 of the SEBI Listing Regulations provides that:

- The listed entity shall have a policy for the preservation of documents, approved by its board of directors, classifying them into 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 the completion of the relevant transactions.
- It is further provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Additionally, **Regulation 30(8)** stipulates that disclosures made to stock exchanges under Regulation 30 must be hosted on the company's website for a minimum of five years and thereafter archived in accordance with the company's archival policy.

In light of these requirements, this document outlines the **Policy for Preservation of Documents and Archival of Disclosures** for **Shalimar Productions Limited**. It provides a robust framework for preserving documents as per statutory obligations and guidelines for managing archival practices for disclosures made to stock exchanges.

This policy ensures compliance with the SEBI Listing Regulations and incorporates the latest regulatory amendments applicable to listed companies to promote transparency, accessibility, and regulatory adherence.

Scope and Applicability:

All documents of **Shalimar Productions Limited** shall be maintained in compliance with the requirements of applicable laws, including the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The preservation and archival of the documents shall be governed by this Policy.

Definitions:

In this Policy, unless the context otherwise requires: -

“**Act**” means the Companies Act, 2013, and the rules issued thereunder.

“**Applicable Law**” means all laws, by-laws, rules, regulations, orders, ordinances, protocols, codes, guidelines, policies, notices, directions, judgements, decrees or other requirements or official directive of any Governmental Authority and/or of any statutory authority in India.



“Board of Directors” or **“Board”** shall mean the Board of Directors of the Company, as constituted from time to time.

“Company” means Shalimar Productions Limited.

“Documents” refers to papers, records, files, tapes, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challans, CDs, DVDs, electronic storage devices, audio/video recordings 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.

“Electronic Form” means any electronic device such as servers, computer, laptop, compact disc, pen drive, 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.

“Maintenance” means keeping documents, either physically or in Electronic Form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

“SEBI Listing Regulations” means Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Words and expressions used in this Policy but not defined shall have the meaning as given in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Any subsequent modification and/or amendments brought about by SEBI in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 shall automatically apply to this Policy.

Roles and Responsibilities:

The respective Functional/Departmental Heads of the Company shall be responsible for the maintenance and preservation of documents within their areas of responsibility, in accordance with this Policy.

In the event that an authorized person resigns or is transferred to another location within the Company, the individual shall, prior to the effectiveness of such resignation or transfer, ensure that all relevant documents (whether in physical or electronic form) under their custody are handed over to their successor. This includes providing any associated passwords, locks, keys, and devices used to store such documents, in compliance with the Policy.

Classification of Documents:

For the purpose of the Policy, the Documents of the Company are classified as follows:



- a. The list of documents that shall be permanently preserved is outlined in **Annexure A** to this Policy. These documents shall be preserved permanently by the Company, subject to any modifications, amendments, additions, deletions, or other changes made from time to time. Furthermore, all such changes, including modifications, amendments, additions, or deletions, shall also be preserved permanently by the Company.
- b. The list of documents that shall be preserved for a period of not less than 8 years following the completion of the relevant transaction is provided in **Annexure B** to this Policy. These documents shall be preserved for the specified period, subject to any modifications, amendments, additions, deletions, or other changes made from time to time. All such changes, including modifications, amendments, additions, or deletions, shall also be preserved for the same period.

Modes of Preservation:

The Authorized Person shall:

- a. Documents shall be preserved in either physical or electronic form, as appropriate, in compliance with the Company's preservation policy.
- b. Preservation of the documents shall be undertaken in a manner that ensures no tampering, alteration, destruction, or any act that may compromise the content, authenticity, integrity, or accessibility of the documents.
- c. The preserved documents shall be made accessible at all reasonable times, ensuring that users can retrieve the documents when required, in accordance with established guidelines.
- d. Access to preserved documents shall be carefully controlled to maintain their integrity and confidentiality. Unauthorized access shall be prohibited through effective access control measures.
- e. The Company shall establish adequate provisions for the backup of all preserved documents, ensuring that both physical and electronic records are safeguarded against loss, corruption, or other risks.

Destruction of Documents:

- a. The preserved records and documents shall undergo an annual review to identify those that are due for disposal in accordance with the retention schedule.
- b. Upon completion of the minimum retention period, documents shall be destroyed, except where they are needed for ongoing or potential litigation, audit, or other statutory or regulatory processes.
- c. Destruction of documents shall ensure that neither the organization nor any third party can access the document or any part of its content.
- d. If the organization is involved, or reasonably anticipated to be involved, in any litigation, audit, or similar legal proceedings by statutory or regulatory authorities, the destruction of relevant records shall be temporarily suspended until the conclusion of such matters.



- e. The Functional/Department heads respectively shall be responsible for the ongoing process of identifying the records, which have met the required preservation period and overseeing their destruction.
- f. The documents may be destroyed in any of the following manner:
 - i. Recycle non-confidential paper records;
 - ii. Shred or otherwise render unreadable confidential paper records; and
 - iii. Permanently delete or destroy electronically stored data.

Archival Policy:

- a. The Company will host all relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations on the Company's website, under the section titled "[Investor Relations]," for a minimum period of five years. After this period, the documents will be archived for retrieval for such additional period as determined by the Chief Executive Officer and Managing Director of the Company. (Refer Annexure C)
- b. Any individual wishing to review archived information or events communicated to the stock exchanges may submit a request to the Company Secretary and Compliance Officer.
- c. This Policy will be reviewed periodically and updated as necessary, based on changes in applicable laws, regulations, or internal processes.
- d. The adoption of this Policy will be communicated to the stock exchange(s) where the Company's equity shares are listed. This Policy will also be disclosed on the Company's website.

Custody of the Documents:

The official of the Company required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law. The custody of the documents shall be with the Key Managerial Persons. Where the authorised KMP tender's resignation or is transferred from one location of the Company to another, such person shall hand over all the relevant documents, lock and key, access control or password, or Company Disc, other storage devices or such other documents and devices in his possession under the policy. The Board may authorize such other person as it may deem fit as the Authorized Person.

Authority to make alteration to the Policy:

The Board of Directors are authorized to make such alteration to this policy as considered appropriate, however, subject to the condition that such alteration shall be in accordance with applicable laws, including the provisions of the Companies Act, 2013, as amended (the "Companies Act") and the SEBI Listing Regulations, 2015.



Interpretation:

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this policy.

Periodical review of the policy by the Board of Directors:

The Policy for Preservation of Documents and Archival policy shall be reviewed periodically by the Board and amendments effected subject to the approval of the Board if any and when practical difficulties are encountered. The Board may also review this policy on document retention to comply with any local, state, and central legislation that may be promulgated from time to time.

In case of any subsequent changes in the Companies Act, 2013 or SEBI Listing Regulations which makes any of the provisions in the Policy inconsistent with the Regulations, the provisions of the Act or Regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.



Annexure A

Documents / Record whose preservation shall be permanent in nature

Sr. No.	Documents / Records
1.	Certificate of Incorporation
2.	Memorandum and Articles of Association
3.	Agreements made by the Company with stock exchanges, depositories, etc.
4.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act and as per the applicable Secretarial Standards
5.	Register of Sweat Equity Shares
6.	Register of Employee stock option
7.	Register of shares or other securities that have been bought back
8.	Share certificate forms and related books and documents – disputed cases
9.	Register and Index of Members, debenture-holders, if any or other security holders, if any
10.	Register of Directors and Key Managerial Personnel
11.	Register of loans, guarantees, security and acquisition
12.	Register of Contracts as per Companies Act
13.	Register of Charges as per Companies Act
14.	Register of Investments as per Companies Act
15.	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
16.	Authorization / licenses obtained from any statutory authority
17.	Policies of the Company framed under various regulations
18.	Register of disposal of records
19.	Annual Reports of the Company
20.	Forms and returns filed with the Registrar of Companies, Ministry of Corporate Affairs, SEBI or any other regulatory authority.
21.	Any court/ NCLT orders
22.	Material Agreements of the Company
23.	Other statutory registers and documents maintained by the Company under various laws applicable to the Company or as prescribed by the Board of Directors from time to time.



Annexure B

Documents / Records to be preserved for a minimum period of eight years.

Sr. No.	Documents/Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act
2.	Annual Returns as per Companies Act
3.	Register of Deposits as per Companies Act
4.	Register of Allotment (from the date of each allotment) as per Companies Act
5.	Annual financial statements including: - Annual accounts - Directors report - Auditors report
6.	Books of accounts including Vouchers / Voucher register as defined under the Companies Act
7.	Income Tax Returns filed under Income Tax Act, 1961
8.	All notices in form MBP-1 received from Directors and KMPs along with any amendment thereto
9.	Return of declaration in respect of beneficial interest in any share as per Companies Act
10.	Copy of newspaper advertisement or publications
11.	Compliance Reports received from any statutory authority
12.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
13.	Disclosure/Return filed under SEBI Listing Regulations
14.	Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers
15.	Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM)
16.	Any other Document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act and/or the SEBI Listing Regulations



Annexure C

List of Documents available on the website of the Company.

Sr. No.	Documents / Records
1.	Basic information about the Company including the details of its businesses;
2.	All information and/or Documents required to be posted on the website as specified in the Companies Act, 2013 and/or Regulation 46(2)/Regulation 30 of the SEBI (LODR) Regulations, 2015.
3.	All Documents required to be filed with Stock Exchanges under aforesaid Regulations.
4.	Any changes in the content shall be updated within 2 working days on the website.
5.	Schedule of Analyst or Institutional Investor meet and presentations made by the Company to them.
6.	The information/Documents provided on the website shall be for current financial year & for preceding five financial years.