



SUVIDHA INFRAESTATE CORPORATION LIMITED

POLICY ON PRESERVATION OF
DOCUMENTS

1. BACKGROUND:

The Securities and Exchange Board of India has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") on September 2, 2015 to be effective from December 1, 2015.

Regulation 9 of the Listing Regulations deals with the preservation of documents divided in two categories:

- (a). Documents whose preservation shall be permanent in nature.
- (b). Documents with preservation period of not less than 8 years.

2. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

- I. Certificate of Incorporation
- II. Certificate of Commencement of Business
- III. Memorandum & Articles of Association
- IV. License, Certificate, Registration Documents obtained from various Statutory Bodies in India
- V. Numbers allotted by the various Statutory Bodies
- VI. Minutes of Meeting of Board and its Committees
- VII. Minutes of Meeting of Shareholders
- VIII. Statutory Register required under the provision of Companies Act 1956 & 2013
- IX. Documents filed with Bombay Stock Exchange
- X. Documents uploaded on the website of the Company
- XI. All the Documents and Returns, Forms etc filed with the Registrar of Companies
- XII. All the kinds of Court Orders

3. DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN 8 YEARS

- I. Books of Accounts
- II. Accounting and Corporate Tax records
- III. Bank records
- IV. Employment, Employee and Payroll records
- V. Marketing And sales documents
- VI. Insurance related documents

This policy can be amended by the Board and the amended policy shall prevail thereafter.

SUVIDHA INFRAESTATE CORPORATION LIMITED

POLICY ON MATERIALITY

1. BACKGROUND:

The Securities and Exchange Board of India has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") on September 2, 2015 to be effective from December 1, 2015.

Regulation 30 of these Listing Regulations deals with disclosure of the material events by the listed entity specified under part A Schedule III of the Listing Regulation.

Further SEBI Has issued a circular on 'Continuous Disclosure Requirements for the listed Entities' on September 9, 2015 indicating the details that need to be provided while disclosing above event.

Regulation 30 and the above circular states that:

- a) The event specified in Para A of the Part A of Schedule III of the Listing Regulations are deemed to be "Material Event" and the listed entity shall make disclosure of such event to the Stock Exchange.(enclosed as Annexure - I)
- b) The event specified in Para B of the Part A of Schedule III of the Listing Regulations are to be disclosed to the stock exchange , if considered "Material" pursuant to the Company's policy on "Reporting of Material Event under Regulation 30 of Listing Regulations".(enclosed as Annexure - II)

As per Regulation 30(8) of the Listing Regulations, the company is required to disclose on website all such events or information which is to be disclosed to the stock exchange pursuant to this Regulation,

The disclosure made to the stock exchange shall be hosted on the website of the Company for a minimum period of 5(five) years and thereafter as per the Archival Policy of the Company. This policy is to be uploaded on the website of the Company.

2. Archival Requirement :

The information made to the stock exchange would be hosted on the website of Company for the period of the 5 years from the date of such hosting under the Investors section.

3. Review of Policy

In case there any regulatory changes requiring modifications to the Policy, the policy shall be reviewed and amended with the due approval from the Managing Director & Board. However, the amended regulatory requirements will supersede the policy till the time policy is suitably amended.

Annexure-I

The indicative list of information, whether material or not, shall be published on the website of the Company:

1. Acquisition (s) (including agreement to acquire), Scheme of Agreement (amalgamation /merger/demerger/restructuring), or sale or disposal of any unit(s), division(s) or subsidiary of the listed entity or any other restructuring.
2. Issuance or forfeiture of securities ,split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture ,reissue of forfeiture securities ,alteration of calls, redemption of securities etc.
3. Revision in Rating(s)
4. Outcome of Meeting of Board of Director in respect of:
 - Dividend and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched;
 - Any cancellation of dividend with the reasons thereof;
 - The decision on Buyback of Securities;
 - The decision with respect to the fund raising proposed to be taken;
 - Increase in capital by the issue of bonus shares through capitalization including the date on which such bonus shares would be credited /dispatched;
 - Reissue of forfeited share or securities ,or the issue of shares or securities held in reserve for the future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;
 - Short particulars of any other alterations of capital ,including calls;
 - Financial results
 - Decision on voluntary delisting by the listed entity from stock exchange(s)
5. Agreements (viz. shareholder agreements(s), joint venture agreement (s),family settlement agreement(s),(to the extent that it impacts management and control of the listed entity),agreements(s)/treaty(ies) /contract(s) with media companies)which are binding and not in normal course of business , revision(s) or amendment(s) and termination thereof.
6. Fraud /Defaults by promoter or key managerial personnel or by the listed entity or arrest of key managerial personnel or promoter.
7. Change in director, key managerial personnel or promoter (Managing Director, Chief Executive Officer, Chief Financial officer , Company Secretary etc.) , Auditor and Compliance Officer.
8. Appointment or discontinuation of share transfer agent.
9. Corporate debt restricting

10. One Time settlements with a Bank.
11. Reference to BIFR and winding up petition filed by any party /creditors.
12. Issuance of notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by listed entity.
13. Proceedings of annual and extraordinary general meetings of the listed entity.
14. Amendments to memorandum and articles of association of listed entity, in brief.
15. Schedule of analyst or intuitional investor meet and presentations on financial results made by the listed entity to analysts or intuitional investors.

Annexure-II

The Indicative list of information, which if considered “Material “in nature, shall be the published in the website:

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Change in the general character or nature of business brought about by:
 - 2.1 arrangements for strategic, technical, manufacturing, or marketing tie-up,
 - 2.2 Adoption of new lines of business
 - 2.3 Closure of operations of any unit/division (entirety or piecemeal).
3. Capacity addition or product launch.
4. Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
5. Agreements (viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
6. Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire, etc.), force majeure or events such as strikes, lockouts, etc.
7. Effect(s) arising out of change in the regulatory framework applicable to GCPL.
8. Litigation(s) / dispute(s) / regulatory action(s) with impact.
9. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory Approvals.
10. Fraud/defaults etc., by directors (other than key managerial personnel) or employees of GCPL.
11. Options to purchase securities including any ESOP/ESPS Scheme.
12. Giving of guarantees or indemnity or becoming a surety for any third party.

