

POLICY OF SPORTKING INDIA LIMITED FOR PRESERVATION OF DOCUMENTS

INTRODUCTION

This policy is in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also beneficial for the safe disposal/destruction of the Documents and keeping a record of the same.

OBJECTIVE

The objective of this Policy is to lay down the principles for the preservation of documents and records of the Company.

REGULATORY FRAMEWORK

Regulation 9 of the SEBI Regulations requires listed entities to have a Policy on Preservation of documents approved by its Board of Directors, classifying the documents in at-least two categories, which are as follows:

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

Accordingly, this policy is framed as per the requirements of the SEBI Regulations.

DEFINITIONS:

- a) Act: “Act” means the Companies Act, 2013 including any amendment or modification thereof.
- b) “Applicable Law” means any law, rules, circulars, guidelines or standards under which the preservation of the Documents has been prescribed.
- c) Authorised Person” means any person duly authorised by Board of Directors.
- d) Board: Board means Board of Directors of the Company
- e) “Books of Account” as per Section 2(13) of the Companies Act 2013 includes records maintained in respect of—(i) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure

take place;(ii) all sales and purchases of goods and services by the company;(iii) the assets and liabilities of the company; and(iv) the items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section.

- f) Company: "Company" means Sportking India Limited
- g) Document: "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.
- h) "Listing Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- i) "Maintenance" means keeping Documents, either physically or in Electronic Form.
- j) "Preservation" means to keep in good order and to prevent from being damaged or destroyed.
- k) Secretarial Standards: "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Regulations or any other applicable law or regulation to the extent applicable to the Company.

MODES OF PRESERVATION

The Documents may be preserved in

- i. Physical form or
- ii. Electronic Form.

The officer of the Company required to preserve the Document shall be Authorised Person who has to observe the compliance of requirements of Applicable Law and this policy.

CUSTODY OF THE DOCUMENTS

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person.

AUTHORITY FOR APPROVAL OF POLICY

The Board shall have the authority for approval of this policy in pursuance to the Regulations.

AUTHORITY TO MAKE ALTERATIONS TO THE POLICY

The Managing Director is authorised to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Act, Regulations thing and other applicable laws.

TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

- a) All the documents and records stated in Annexure A to this Policy shall be preserved permanently by the Company.
- b) All the documents and records stated in Annexure B to this policy shall be preserved for not less than 8 years or such other longer period as may be prescribed under applicable laws/ rules/ regulations for the time being in force and thereafter the records can be destroyed.

CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

AMENDMENTS TO THE POLICY

- a) The Policy would be subject to revision/ amendment in accordance with the applicable laws.
- b) The Company reserves its rights to alter, modify, add, delete or amend any of the provisions of this policy.
- c) In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being 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.

ANNEXURE 1:**DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:**

Sr. No	Nature of Document(s)
1.	Memorandum of Association and Articles of Association as originally filed and updated from time to time
2.	Certificate of Incorporation
3.	Minutes of Board and Committee Meetings
4.	Minutes of General Meeting
5.	Register of Members
6.	Index of Members
7.	Listing Agreement
8.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

ANNEXURE 2:**DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:**

Sr. No	Nature of Document(s)
1.	Books of Accounts
2.	Copies of all Annual Returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto
3.	Tax related records and documents
4.	Register of debenture holders or any other security holders
5.	All notices pertaining to disclosure of interest of directors
6.	Attendance Register for Board/ Committee meetings/ General Meetings
7.	Office copies of General Meeting Notices, scrutinizer's report, and related papers
8.	Office copies of Board Meeting, Notices, Agenda, notes on agenda and other related papers
9.	Newspaper cuttings of notices of Board Meeting and Financial Results
10.	Disclosures under SEBI –Substantial acquisition of shares and Takeovers, Regulations
11.	Correspondence with shareholders
12.	Disclosures under SEBI –Prohibition of Insider Trading Regulations
13.	Documents of Human Resource department as per relevant applicable law
14.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time