

SUNPOINT TRADING LIMITED

(CIN: L46109GJ1988PLC010293)

Regd. Office: 3, Ravipushp Apartment, B/s. Navneet House, Memnagar, Ahmedabad-380052
Tel.: (079) 27496313 Email: sfgl.1988@gmail.com

Policy on Preservation of Documents

*(Adopted by the Board of Directors on 26th October, 2015
which will be effective from 1st December, 2015)*

PURPOSE OF POLICY

The Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every listed company to have a policy on preservation of records.

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy.

This Policy categorizes the records that will be preserved indefinitely without any time limit and the records that will be preserved for specified period of time and outlines responsibilities to create, maintain and lawfully dispose of the records. It endorses the preservation of records in the Company's Archives.

DEFINITIONS

- i. **"Company"** means Sunpoint Trading Limited;
- ii. **"Board"** means the board of directors of Sunpoint Trading Limited;
- iii. **"Listing Regulations"** means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015
- iv. **"Policy"** means this Policy of Preservation of Documents of Sunpoint Trading Limited;
- v. **"Records"** in relation to this policy includes accounting records, books or papers and books and papers as defined in sub-section 12 of section 2, books of accounts as defined in sub-section 13 of section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not.
- vi. **"Documents"** means Document as defined in sub-section (36) of Section 2 of the Companies Act, 2013, Documents includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

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- vii. **“Maintenance”** means keeping registers and records, either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such registers and records.
- viii. **“Preservation”** means to keep in good order; to prevent from being damaged or destroyed
- ix. **“Register”** means a register maintained under the Companies Act, 2013 or the SEBI Act.

Any other term not defined herein shall have the same meaning as prescribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

OBJECTIVE OF POLICY

This Policy mechanism provides the comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- c) Systematic disposal/ destruction of Company’s non-current records that have outlived their administrative usefulness.
- d) Identification of the Company’s records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company’s Archives.

VALUE OF RECORDS

The Company understands the value of its records. Thus attached to this Policy are the combinations of qualities that relate to their importance, usefulness or quality. The following values are offered by the records:

- informational value – all information presented, whether written, pictorial or audio
- material value – intrinsic information about the records that can be retrieved from the material itself, such as age, provenance, history, software
- Cultural value – encompasses a range of values such as political, religious, historical, ethical, aesthetic, and many other similar values.

As per this Policy, the Company shall preserve the qualities of all records as far as possible.

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SCOPE OF THE POLICY

For the purpose of achieving the above objectives, the documents covered as per this Policy have been divided into two sections, i.e. the records or the documents that will be preserved permanently by the Company and the records or the documents that will be preserved for the period of at least 8 years and not permanently. This Policy applies to the records maintained by the Company in any format or medium. The records which are not required to be retained permanently shall be disposed off according to this Policy.

AUTHORITY AND RESPONSIBILITY

The Compliance Officer, as designated by the Board of the Company in this behalf, shall be responsible for the preservation of the records according to the time frame prescribed in the Policy for their preservation.

All staff and management of the Company shall assist in implementing this Preservation Policy as appropriate to their roles and responsibilities.

CLASSIFICATION OF RECORDS

Based on the requirement and for the purpose of effective management, the period for which the records of the Company shall be maintained have been classified into two categories:

- I. Documents whose preservation shall be permanent in nature;
- II. Documents whose preservation shall be at least 8 years.

The classification of the documents has been made in the Annexure which forms part of this Policy. While prescribing different time period for preservation of records, the following aspects have been taken into account:

- (a) Compliance with statutory and regulatory requirements.
- (b) Satisfaction of the needs of SEBI/ RBI/ MCA inspectors to have access to certain records.
- (c) Satisfaction of the needs of internal and external auditors to have access to certain records.

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation by which they are governed.

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LOCATION OF RECORDS

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute shall be maintained at the corporate office of the Company or at any other place as may be approved by the Board, from time to time.

ACCESS AND AUTHENTICITY

The preservation of the records of the Company is vital in order to ensure all current and future access to the records. Preservation is also concerned with ensuring the authenticity of records.

The Compliance Officer shall prepare a matrix for identifying persons who will be allowed to access different kinds of records maintained & preserved by the Company. Since the records are maintained at different levels and departments in the Company, therefore Functional Heads should be authorized to ensure the preservation and access to the Records under their jurisdiction.

RECORD RETENTION SCHEDULE

The records referred to in Annexure A and B of this Policy shall be maintained permanently and the records which are required to be preserved permanently on the website of the Company shall be preserved in line with the Website Archival Policy of the Company.

Records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use, therefore disposal will aid efficiency. The records referred to in Annexure C shall be preserved for at least 8 years and the records referred to in Annexure D, as mentioned therein and thereafter as per the discretion of the Board records may be disposed of in the manner prescribed by it.

The Company shall maintain a register of preservation and disposal of records in the custody of the Compliance Officer of the Company, wherein the brief particulars of the records preserved and/or removed from the location after the expiry of its preservation period shall be entered. The register of preservation and disposal of records shall contain the following columns:

- a) Item Number;
- b) Brief Particulars of the records preserved/ disposed of;
- c) Date of creation of the record;
- d) Date of removal from the register;

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e) Whether preserved permanently or not; and

f) Mode of destruction This register of preservation and disposal of records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or electronic form.

This register of preservation and disposal of records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or electronic form

RECORD APPRAISAL

The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process is to ensure the records are examined at the appropriate time to determine whether or not they are worthy of archival preservation, whether they need to be retained for a longer period as they are still in use, or whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the Board of the Company.

RISK-BASED APPROACH

The Company adopts a risk-based approach in an endeavor to preserve the collection of its records. A preservation risk assessment for the whole collection shall be conducted and subsequently shall be reviewed periodically. The result of the risk assessment would be used to determine the urgency of preservation action: a low risk may simply indicate that the risk assessment should be recalculated at a future date, whereas a high risk will trigger immediate action.

COMPLIANCE OFFICER

The Company Secretary of the Company shall be the Compliance Officer of the Company.

Manner of preservation of documents :

The Company shall keep /preserve documents either in physical or electronic mode.

Disposal/Destruction of Records :

Disposal/ Destruction as a normal administrative practice usually occurs because –

- The records are duplicated, unimportant or for short term use only; or
- The temporary records after the relevant or prescribed period.

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Physical records required to be disposed of pursuant to the preservation periods specified in the Document Preservation Schedule shall be disposed of either using a cross-cut shredder or by burning it. The Records/Admin. Department shall adopt appropriate procedures to permanently dispose of any non-paper physical records, such as photographs or audio/video recordings.

In the event that it is necessary to manually dispose of an electronic record, the IT Department shall use the "permanent delete" function to permanently dispose of electronic records.

Hold on Record Destruction and Deletion

If a lawsuit or other proceeding involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, must cease immediately. Documents relating to the lawsuit or potential legal issue will then be retained and organized under the supervision of the Head of the concerned Department and head of the concerned department will take appropriate steps to preserve all relevant documents.

Archival of disclosure made to stock exchange:

All events of information's which has been disclosed to stock exchange under Regulations shall be hosted on web site of the Company and same can be archived for a period of 5 years from the date of disclosure.

E-Mail Policies :

All electronic communication systems as well as all communications and stored information transmitted, received, or contained on the Company's information systems are the property of the Company. Employees have no expectation of privacy in connection with the use of Company equipment or with the transmission, receipt, or storage of information using the Company's equipment.

Compliance Officer may access communications and stored information at any time without notice or consent.

Employees should avoid using Company e-mail for personal purposes

EFFECTIVE DATE AND POLICY ENFORCEMENT

This Policy shall be effective from 1st day of December, 2015.

REVIEW OF THE POLICY

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments.

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ANNEXURE – A Records to be preserved permanently

Item No.	Records
1.	Certificate of incorporation
2.	Certificate for commencement of business
3.	Memorandum and Articles of Association
4.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
5.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
6.	Register and Index of Members, debenture-holders, if any or other security holders, if any
7.	Register of Contracts as per Companies Act, 2013
8.	Register of Charges as per Companies Act, 2013
9.	Register of Investments as per Companies Act, 2013
10.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
11.	Compliance Reports received from any statutory authority
12.	Correspondences made with any statutory authority
13.	Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
14.	Authorization / licenses obtained from any statutory authority
15.	Policies of the Company framed under various regulations
16.	Register of preservation and disposal of records
17.	Register of Power of attorneys, if any

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18.	Certificates obtained from various statutory authorities
19.	Forms and returns filed with any statutory authority

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ANNEXURE - B

Preservation of Corporate Polices :

The Company shall preserve permanently various policies framed under Companies Act, 2013 and SEBI regulations from time to time viz.:

1. Code of Conduct for Board of Directors and Senior Management
2. Corporate Social Responsibility Policy
3. Policy for determining Material Subsidiary
4. Related Party Transaction Policy
5. Risk Management Policy
6. Remuneration Policy
7. Whistle blower Policy
8. Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders
9. Code of practices and procedures for fair disclosure of unpublished price sensitive information
10. Policy on Materiality of Events
11. Policy for preservation of Documents
12. Sexual Harassment Policy

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ANNEXURE – C

Records to be preserved for minimum period of eight years

Item No.	Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Register of Inter Corporate Loans and Investments as per Companies Act, 2013
3.	Annual Returns as per Companies Act, 2013
4.	Register of Deposits as per Companies Act, 2013
5.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
6.	Annual financial statements including: - Annual accounts -Directors report -Auditor's report
7.	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
8.	Income Tax Returns filed under Income Tax Act, 1961
9.	All notices in form MBP – 1 received from Directors and KMPs Along with any amendment thereto
10.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
11.	Copy of newspaper advertisement or publications
12.	All agreement entered into by the Company from the date of its Termination
13.	All show cause notice or any other notice received from any statutory , government departments, Judicial or Quasi-judicial authority etc.

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14.	Register of Directors' Attendance
15.	Register of Member's Attendance
16.	Ballot Papers and Scrutinizer Report
17.	Register & Records of Postal Ballot
18.	Documents/forms filed with Registrar of Companies.
19.	Annual Reports
20.	Declarations/Certificates received under Code of Conduct
21.	Register of Inspection
22.	Financial Documents in respect of Borrowings
23.	Contract, Agreements and Sub Contracts related to Work

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ANNEXURE – D

Disclosures made/ received under SEBI Regulations shall be preserved as under :

Sr. No.	Regulation	Name of the Documents/Records	Preservation Period
1	Regulation 6 under SEBI (Prohibition of Insider Trading) Regulations, 2015	Disclosures made under this regulation	Five years
2	Regulation 30 under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	All events/information's which has been disclosed to stock exchange(s)	Disclosures of such events/information's shall be hosted on the website for Five years and thereafter as per the archival policy of the Company
3	Regulation 40(3) under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	proper verifiable dated records of all correspondence with the investor shall be maintained by the Company	Five years
4	Securities and Exchange Board of India (Substantial Acquisition of Shares And Takeovers) Regulations, 2011	Disclosures made under this Regulations	Five years