

# **Preservation of Documents Policy and Archival Policy**

**(SMC Global Securities Limited)**

## **Objective:**

The primary objective of Preservation of Documents Policy of the company (“**SMC GLOBAL SECURITIES LIMITED**”) is to preserve records and document that are necessary for future reference and are statutorily required as per various statues and further to use information / documents for the longest possible period.

## **Vision of the Policy:**

The vision of the Preservation of Documents policy shall be to ensure the durability and the use of information, in the present and the future. The standpoints of the preservation policy shall provide the point of departure for the compilation and implementation of the preservation strategy and the strategy action plan for the Company.

The whole Preservation of Documents policy has been divided into two parts keeping in view the requirement of the Company in the following manner:

- (i) As a Company registered with Registrar of Companies / Listed entity with exchange(s) and
- (ii) As a Trading Member/ Clearing Member/ Depository Participant with SEBI / exchange (s).

**Documents to be preserved under Companies Act, 2013/ SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 / Securities Contract Regulations Act, 1956**

## **The time period for Preservation of Records & Documents**

- 1) Registers of investments in securities not held in the name of the Company - Permanent
- 2) Register of buy-back of securities - 8 years from the date of completion of buyback
- 3) Register of charges - Permanent
- 4) Register and index of members - Permanent

- 5) Register and index of debenture holders - 15 years from the date of redemption of debentures.
- 6) Foreign Register of members or debenture holder - To be maintained until discontinued.
- 7) Register of renewed and duplicate certificates – Permanent
- 8) Register of contracts in which directors are interested - Permanent
- 9) Register of directors, managing director, manager and secretary – Permanent.
- 10) Register of directors' share holding - Permanent
- 11) Register of inter corporate loans and investments - Permanent
- 12) Register of deposits - 8 years from the date of last entry
- 13) Register of allotment - 8 years from the date of each allotment
- 14) Register of payment of dividend - 8 years from the date of payment
- 15) Register of Director's attendance -8 years
- 16) Register of postal ballot - Until the resolution has been implemented or for a period of 10 years whichever is later.
- 17) Register of proxies - 8 years from the date of meeting.
- 18) Register of inspection - 8 years
- 19) Register of investment (other than securities not held in the name of the company) - – Permanent
- 20) Register of documents executed under common seal - Permanent
- 21) Register of records and documents destroyed – Permanent.
- 22) Register of investor's complaints - 8 years from the date of last entry.
- 23) Register of transfer of shares - Permanent.
- 24) Register of transmission of shares – Permanent.
- 25) Register of transfer of debentures – Permanent.
- 26) Register of transmission of debentures – Permanent.
- 27) Register of employee stock options - 15 years from the date of exercise of options.
- 28) Register of sweat equity shares - 8 years from the financial year in which the latest entry is made.

29) Register in respect of SEBI (substantial acquisition of shares and takeovers) Regulations, 1997 - Permanent

30) Register of SEBI (Prohibition of insider trading) Regulations, 1992 - 5 years

31) Books of Accounts - 8 accounting years immediately preceding the current accounting year

32) Annual Return - Last 8 annual returns

Fifteen years period of preservation has been prescribed in respect of the following:

(a) Register of debenture-holders after the redemption and

(b) Index of debenture-holders after

Provided that the company shall keep the above mentioned documents in the electronic mode as necessary.

**Documents to be preserved under Exchange regulations where the company is a Trading Member / Clearing Member :**

1. The Company shall maintain the following records relating to its business of F&O Segment of the Exchange for a period of five years:-

(a) Order confirmation slips, order modification slips as obtained from the trading system of the F&O Segment of the Exchange.

(b) Trade confirmation slips and exercise notice records as obtained from the trading system of the F&O Segment of the Exchange.

(c) Statements of obligations received from the Clearing Corporation.

(d) Record of all statements received from the settling agencies and record of all correspondence with them.

(e) Order Book of Constituents reflecting the following:

(i) Identity of person receiving the order

(ii) Date and time of order received

(iii) Name of the person placing the order

(iv) Name of Constituent, description and value of derivatives contracts to be bought and sold.

(v) terms and conditions of the order stating particularly price/rate limit or price / rate related instructions and time limit on the order (if any)

The Company shall preserve the following reports produced from the trading system for a period of five years.

- (i) Activity Log
- (ii) Orders Cancelled Today
- (iii) New Orders Today
- (iv) Outstanding Orders Today.
- (v) Trades done today.

A)The Company shall keep for a period of three years such books of accounts, as shall be necessary, to show and distinguish in connection with his business as a Trading Member and also to comply with Rule 15 of Securities Contracts (Regulation) Rules, 1957 :

- (i) The moneys received from or on account of and moneys paid to or on account of each of his constituents; and,
- (ii) The moneys received and the moneys paid on Trading Member's own account.

The Company shall preserve documents related with the F&O Segment of Exchange the originals of the documents, both in electronic and physical form, copies of which have been taken by CBI, Police or any other enforcement agency during the course of their investigation till the trial is completed.

**Documents to be preserved under Exchange regulations where the company is a registered as a Depository Participant :**

As per SEBI Circular SEBI/MRD/DEP/Cir- 16/2005 August 4, 2005.

1. In terms of regulations 38 and 49 of the SEBI (Depositories and Participants) Regulations, 1996 (hereinafter referred to as D&P Regulations, 1996), Depositories and Depository Participants are required to preserve the records and documents for a minimum period of 5 years.

2. The various records / documents which has been collected by enforcement agencies like CBI, Police, Crime Branch etc. during the course of their investigation. These original documents both in physical form and electronic form would be required by such enforcement agencies during trial of the case also.
  
3. In view of the above, notwithstanding anything contained in D&P Regulations, 1996, it is to be preserved the originals of the documents, both in electronic and physical form, copies of which have been taken by CBI, Police or any other enforcement agency during the course of any investigation till the trial is completed.

The documents and records beyond the preservation period may be destroyed under the authority of the Board of Directors of the Company or any Committee or Authorized Person who / which has been duly delegated by the Board in this behalf.

The Company shall maintain a register wherein it shall enter brief particulars of the of the documents / records destroyed and all entries made therein shall be duly authenticated by the Company Secretary or such other person as may be authorized by the Board for this purpose.