

## POLICY FOR PRESERVATION OF DOCUMENTS

### SILVER CONSUMER ELECTRICALS LIMITED

CIN: U46539GJ2021PLC122633

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### Preface

Silver Consumer Electricals Limited (the “**Company**”) is committed to being open and transparent with all stakeholders and believes in disseminating information in a fair and timely manner. The Board of Directors of the Company in pursuance of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “**SEBI Listing Regulations**”) and other applicable provisions (including any statutory enactments/amendments thereof), adopted the following policy for Preservation of Documents (the “**Policy**”) classifying them in at least two categories i.e.

- (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.

## **Applicability and Modes of Preservation**

The listed entity may keep such Documents in physical or Electronic Mode.

Further Regulation 30 (8) of the SEBI Listing Regulations refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter the same shall be archived for a minimum period of 3 years and as per the archival policy of the Company.

Further, as per provisions of Companies Act, certain Documents are required to be preserved permanently or up to a certain prescribed time. In accordance with the Regulation 9, Regulation 30 (8) of SEBI Listing Regulations and the provisions of the Companies Act, and other applicable provisions of law, the Company has framed the Policy in line with the existing provisions of the SEBI Listing Regulations and the Companies Act. Any future changes in the SEBI Listing Regulations or the Companies Act will, *ipso facto*, apply to this Policy. The Policy has been approved by the Board on June 12, 2025.

## **Definitions**

- a. **“Companies Act”** means the Companies Act, 2013.
- b. **“Applicable Law”** means any and all law, rules, circulars, guidelines, orders or regulations as issued from time by the Ministry of Corporate Affairs, The Securities and Exchange Board of India, The Institute of Company Secretaries of India and other professional bodies under which the Preservation of Documents has been prescribed.
- c. **“Board”** or **“Board of Directors”** means the Board of the Directors of the Company.
- d. **“Documents”** refers to agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, filed forms and challan 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 such Applicable Law, maintained on paper or in Electronic Mode.

- e. **“Electronic Mode”** includes electronic device, servers, computer, laptop, compact disc, floppy disc, pen drive, space on electronic cloud or any other form of storage and retrieval device.
- f. **“Preservation”** means to keep in good order and to prevent from being tampered, altered, damaged or destroyed.
- g. Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

## **Preservation**

This Policy sets the standards for Preservation of Documents of the Company, broadly classified in the following categories, which may be preserved, in physical and/or Electronic Mode.

### **1. Category A: Documents to be preserved permanently**

- All Documents of registration received by the Company under the applicable statute, laws, rules and regulations, namely but not limited to certificate of incorporation, memorandum and articles of association, permanent account number, tax deduction account number, excise/service tax/ goods and services tax /sales tax/export /import/ other registration certificates, licenses, court orders, awards, patents, trademarks, copy rights shall be preserved permanently.
- Statutory records and registers that are required to be maintained permanently under the provisions of the Companies Act including annual financial statements with statutory auditor’s report, annual report.
- Minutes of the board meeting, board committee meetings, general meetings of members etc. shall be retained in perpetuity in the Company's minute book.

- Documents relating to any property of the Company, property tax, delegation of powers, all policies/ policy guidelines of the Company framed under various regulations shall be retained perpetually.

**2. Category B: Documents to be preserved for not less than eight years after completion of the relevant transaction:**

The following Documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said Documents shall also be preserved for a term not less than eight years:

- Documents/Information furnished to stock exchanges including information submitted in compliance of SEBI Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the Documents/information is furnished.
- Documents/ information (save and except those under category A) submitted to Registrar of Companies / Ministry of Corporate Affairs in compliance with the Companies Act & rules thereunder shall be preserved for a minimum period of eight years from the end of the financial year in which the Documents/information is submitted.
- Books of Accounts.
- Office copies of notices, agenda, notes on agenda of board meetings and board committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the board of directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" as issued by the Institute of Company Secretaries of India and any amendments thereto.

- Office copies of notices, scrutinizer's report and related papers regarding general meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the board of directors, as prescribed by the "Secretarial Standard-2 on General Meetings" as issued by the Institute of Company Secretaries of India and any amendments thereto.
- Attendance registers for board meeting and recording of attendance of meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the board of directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- 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 transactions under the Act and/or SEBI Listing Regulations.

### **3. Category C: Documents not referred under Category A and Category B**

In addition to the Documents mentioned in Category 'A' and 'B' above, other Documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the rules/ circulars issued in this respect from time to time or as per the applicable statutory/ regulatory provisions in this regard.

### **Mode of Preservation**

The Company shall maintain these records either in physical or Electronic Mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company.

All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under Applicable Law.

The Preservation of the Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the records. The preserved records must be accessible at all reasonable times. Access may be controlled by the heads of the respective business divisions/ departments with Preservation, so as to ensure integrity of the records and prohibit unauthorised access.

### **Roles and Responsibility**

Company Secretary of the Company as well as the head of respective departments shall be responsible for Preservation of the Documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.

### **Destruction of Documents**

After the expiry of the statutory retention period, the preserved Documents (physical or in Electronic Mode as the case may be) may be destroyed with the approval of head of the respective department and board of directors.

### **Review and Amendment to the policy**

This Policy will be reviewed periodically by the Board/ committee as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to the necessary approvals of the Board in cases of material changes to the Policy. The Board is authorized to amend or modify this Policy on recommendation of the Audit Committee. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

## **Interpretation**

In case of any subsequent changes in the provisions of the aforementioned statutes, the statutes would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with prevailing law. Any subsequent amendment/modification in SEBI Listing Regulations, Companies Act and/or applicable laws in this regard shall automatically apply to this Policy.

