



Policy for Preservation of Document

1. Introduction

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all the listed entities, one of the common obligation for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

The Board of Directors of Scintilla Commercial & Credit Ltd (the "Company") is obliged to formulate a policy for "Preservation of Documents" to comply with the requirements of Regulation 9 of the Listing Regulations.

2. Definitions

"**Board**" means the Board of directors of the Company or its Committee.

"**Company**" means Scintilla Commercial & Credit Ltd.

"**Document**" means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.

"**Listing Regulations**" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

Policy

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

- Documents whose preservation shall be permanent in nature (enclosed as Annexure 1) subject to the modifications, amendments, additions, deletions or any changes made therein.
- Documents with preservation period of not less than eight (8) years (enclosed as Annexure 2) after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein.

Provided further that the Company may keep the documents as specified above in electronic mode.



SCINTILLA COMMERCIAL & CREDIT LTD

Authority and Responsibility

For Secretarial record the Company Secretary and for the Commercial record the Managing Director or/and the CFO of the Company shall be responsible to deal with the records according to the time frame prescribed in the Policy for their preservation.

Amendments

The Company reserves the right to amend or modify this policy in whole or in part at any point of time.



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Annexure-1

Documents whose preservation shall be permanent in nature

1. Certificate of Incorporation.
2. Memorandum & Articles of Associations.
3. Licenses, Certificates authorization from statutory authorities.
4. Minutes of Meeting of boards & its committees.
5. Minutes of the meeting of the Shareholders.
6. Statutory Registers required under applicable laws.
7. Audited Accounts.
8. All documents filed with Ministry of Corporate Affairs.
9. All documents filed with SEBI / Stock Exchanges /RBI.
10. Any other document as may be required to be preserved permanently in terms of applicable law(s), maintained and preserved from time to time.



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Annexure-2

Documents with preservation period of not less than eight years

1. Books of accounts.
2. Accounting and Corporate Tax Records.
3. Correspondence with customers & Shareholders.
4. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time