

## POLICY ON PRESERVATION OF DOCUMENTS

### **1. INTRODUCTION**

In accordance with the provisions of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (herein after referred to as “LODR Regulations, 2015), the Board of Directors (“the Board”) of **STI India Limited** (“the Company”) has adopted this Policy on 15<sup>th</sup> February, 2016.

### **2. SCOPE**

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

### **3. OBJECTIVE**

The main objective of this Policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

### **4. DEFINITIONS**

- (i) “**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.
- (ii) “**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.
- (iii) “**Company**” means **STI India Limited**.
- (iv) “**Board of Directors**” or “**Board**” means the Board of Directors of **STI India Limited** as constituted/re-constituted from time to time.
- (v) “**Policy**” or “this Policy” means Policy on Preservation of Documents.
- (vi) “**Register**” means a Register maintained under the Companies Act, 2013 or the SEBI Act.
- (vii) “**Maintenance**” means keeping Documents, either physically or in Electronic form.
- (viii) “**Preservation**” means to keep in good order and to prevent from being altered, damaged or destroyed.

### **5. INTERPRETATION**

Terms that have not been defined in the Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## 6. POLICY

Regulation 9 of LODR Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by Board of Directors, classifying them in at least two categories as follows:

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

Accordingly, the Company has classified the preservation of documents to be done in the following manner:-

- a) Documents that needs to be preserved and retained permanently.
- b) Documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations.
- c) Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.
- d) Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

## 7. MODES OF PRESERVATION

The Documents may be preserved in:

- a) Physical form; or
- b) Electronic form.

The official of the Company who is required to preserve the document shall be Authorized person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of 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 documents.

The preserved documents must be assessable at all reasonable times. Access may be controlled by the Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

## 8. DESTRUCTION OF DOCUMENTS:-

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer

required as per the documents Preservation Schedule given under Annexure A. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at **Annexure B**. The entries in the Register shall be authenticated by the Authorized person.

**9. POLICY REVIEW:**

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

**10. AMENDMENT:**

The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s)/amendment(s) to the Regulation.

**ANNEXURE-A**

**Indicative List**

**A) PERMANENT PRESERVATION:**

- a. Minutes books of Board, General Meetings and Committee Meetings
- b. Statutory Registers
- c. License and Permissions
- d. Statutory Forms and disclosures except for routine compliance
- e. Scrutinizers' Reports
- f. Register of Members
- g. Index of Members

**B) TEMPORARY PRESERVATION UPTO 8 YEARS**

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- f. All notices pertaining to disclosure of interest of directors
- g. Instrument creating a charge or modification
- h. Books of accounts, financial statements etc.
- i. Register of debenture holders or any other security holders

- C) **OTHERS:**  
As per applicable law

## ANNEXURE – B

### Specimen format of the register of documents disposed off / destroyed

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON

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