SHANTAI INDUSTRIES LIMITED

CIN No: L74110GJ1988PLC013255

POLICY ON PRESERVATION OF DOCUMENTS

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INTRODUCTION

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

SCOPE

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

OBJECTIVE OF THE POLICY

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 which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

- To identify statutory records to be preserved.
- To identify records to be maintained either for a period of eight years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form.
- To decide the procedure to destroy the documents after eight years or other applicable period,
- To help employees understanding their obligations in retaining and preserving the documents and records.

DEFINITIONS

1. **"Act"** means the Companies Act, 2013, Rules framed there under and any amendments thereto.
2. **"Board of Directors" or "Board"** means the collective body of the Directors of the Company.
3. **"Company", "This Company", "The Company",** wherever occur in the policy shall mean "Shantai Industries Limited**".**
4. **"Current"** means running matter or whatever is at present in course of passage.

5. **"Electronic Form"** means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

6. **"Maintenance"** means keeping documents, either physically or in electronic form.

7. **"Policy" or "This Policy"** means, "Policy on Preservation of Documents".

8. **"Preservation"** means to keep the documents preventing them from being altered, damaged or destroyed.

9. **"Register"** means a register maintained under the Companies Act, 2013 or the SEBI Act.

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

INTERPRETATION

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

GUIDELINES

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

a. Documents whose preservation shall be permanent in nature;
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 need to be preserved and retained permanently;
b. Documents that need 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".

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure – A.**

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 accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the documents and to prohibit unauthorized access.

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**.

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.

AMENDEMENT

The Board shall have 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 Regulations.

ANNEXURE - A

A. PERMANENT PRESERVATION

1. Certificate of Incorporation
2. Memorandum and Article of Association
3. Minutes books of general, board and committee meetings
4. Registers maintained by the company
5. Policies, Charter and Codes of the company
6. Application and Approval for issue and listing of securities
7. Title document
8. License, certificates, approval etc. received from any government, statutory or Regulatory Authority
9. Intellectual property document including copy rights, trade marks, patent and industrial designs
10. Orders, judgments of Judicial Authorities, Tribunals or Adjudicating Authorities

B. TEMPORARY PRESERVATION UPTO 8 YEARS

1. Notices, agendas and notes on agenda of board and committee meetings
2. Office copies of notices, scrutinizers reports and other documents relating to shareholders/creditors meetings
3. Instrument evidencing creation of charges or modification thereof
4. Annual Financial statements, annual report, directors report and auditor's report and statutory filings
5. Notice of interest received from directors or KMP
6. Protected disclosure under vigil mechanism
7. Disclosure made to Stock Exchange under regulation 30 of the listing regulations
8. Books of Account including vouchers, invoices, bank records, audit records, financial statements etc
9. Correspondence with Tax authorities
10. Excise invoices, bills, challans etc
11. Tax returns and assessment records
12. Registration certificates under tax laws
13. Purchase orders, bill of entry etc.
14. Documents relating to employees, payroll, bonuses, performance reviews and other personnel related documents
15. Documents relating to procurement of hardware, software, licences, operating/user manual, inventory of backup data, server log etc
16. Marketing and Sales policies, credit approval forms and rating of customers, agreements with agents and other related documents

C. OTHERS

As per applicable law.

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(This policy is approved and amended by the Board of Directors at their meeting held on 28th May, 2024 and effective from 28th May, 2024)