



SHRISTI INFRASTRUCTURE DEVELOPMENT CORPORATION LIMITED

Policy for Preservation of Documents

1. INTRODUCTION

Securities and Exchange Board of India (SEBI) notified SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) vide its notification dated 2nd September, 2015 to consolidate and streamline the provisions of existing listing agreements for different segments of the capital market. The aforesaid Regulations shall come into force on the ninetieth day from date of publication in the Official Gazette i.e. 1st December, 2015.

In terms of Regulation 9 of the Listing Regulations, 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.

Provided that the Listed Entity may keep the documents specified in clauses a. and b. in electronic mode.

The Board of Directors (“the Board”) of Shristi Infrastructure Development Corporation Limited (“the Company”), authorized the KMPs to adopt this Policy namely “Policy for Preservation of Documents” on the 14th of November, 2015 with regard to preservation and archival of documents, in compliance with the requirements of Listing Regulations (including any subsequent amendment thereto or modification thereof).

2. POLICY OBJECTIVE

The objective of the said Policy is the systematic identification, classification, maintenance, evaluation, retention and archival of documents received or created in the course of business.

3. APPLICABILITY

This Policy shall be applicable to the Company with effect from 1st December, 2015.

4. SCOPE OF THE POLICY

The contents and definition of a document is a subjective matter and significantly changing. The preservation of the documents in the identified categories should be determined primarily by the application of the law governing preservation of such document, if any, or general guidelines affecting such documents as well as any other appropriate factors as maybe determined by the Board or the concerned Functional Head in the best interest of the Company.

5. DEFINITIONS

In this Policy, the following words and expressions, unless the context otherwise requires, shall have the following meanings ascribed to them:

“Archive” is an accumulation of historical records or the physical place/electronic mode where they are located.

“Board of Directors” or “Board” means the Board of Directors of Shristi Infrastructure Development Corporation Limited, as constituted from time to time.

“Company” means Shristi Infrastructure Development Corporation Limited.

“Document” means notices, minutes, registers, returns, records, forms, agreements, memorandum or any other document or record maintained by the Company or person in the transaction of business or the conduct of affairs of the Company (whether maintained in physical or in electronic form).

“Maintenance” means keeping registers, records, either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such registers and records.

“Policy” means Policy for Preservation of Documents.

“Preservation” means to keep in proper order; to prevent documents from alteration, damage or getting destroyed.

“Year” means the period ending on the 31st day of March every year.

All other words used and not defined in this Policy, but defined in various Acts, Rules and Regulations to which the documents/record pertains to shall have the meanings as respectively assigned to them in such acts or rules or regulations or any statutory modifications or re-enactments thereto, as the case may be.

6. RESPONSIBILITY

All Head of Departments and Functional Heads are responsible for the preservation of documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area of work/operations.

7. DOCUMENTS TO BE PRESERVED

The list of documents with preservation period under this Policy is appended in Annexure-1 to this Policy and is an illustrative list but not an exhaustive list.

8. GENERAL RULE GOVERNING POLICY ON PRESERVATION OF DOCUMENTS

- (a) The documents not covered under the aforesaid categories shall be preserved as guided by the law governing preservation of such document(s), if any, or general guidelines affecting such documents.
- (b) If any document is relevant to litigation or anticipated or to be relevant to litigation (i.e. a dispute that could result in litigation), then such documents shall be preserved permanently.
- (c) Notwithstanding anything contained above, the Statutory Authority governing these documents may, by order in writing, direct any company to preserve any of the documents mentioned beyond the period specified for preservation.
- (d) In case of ambiguity, the Board is the authority to decide the preservation period of such documents.

9. ARCHIVAL POLICY

The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under Regulation 30 of the Listing Regulations and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years from the date of its disclosure and shall thereafter be archived from the website of the Company for a further period of 2 years.

The Archival Policy which is a part of Policy for Preservation of Documents prepared pursuant to Regulation 9 of the Listing Regulations shall be hosted on the website of the Company.

10. REVIEW OF THE POLICY

The Policy shall be reviewed as may be deemed fit by the Board along with the respective Functional Heads who would identify the documents and the time period for retention of documents and recommend the same for the approval of the Board.

Any subsequent amendment/ modification in the Regulations (including any circular, notification, press release) governing this Policy, shall automatically apply upon the Policy and the Policy will be deemed to be modified to that extent.

Date: 14.11.2015

Place: Kolkata

Illustrative list of the Records/Documents to be preserved**A. Secretarial Records/Documents**

Sl. No.	Record/Document Type	Preservation Period
1.	All documents and registers as originally filed with Registrar of Companies for Incorporation of Company	Permanent
2.	Register of Renewed and Duplicate Share Certificates (SH-2)	Permanent
3.	Register of Members along with the index (MGT-1)	Permanent
4.	Register of Charges (CHG-7)	Permanent
5.	Register of Contracts or Arrangement in which Directors are interested (MBP-4)	Permanent
6.	Register of Loans, Guarantee, Security and Acquisition made by the Company (MBP-2)	Permanent
7.	Register of Investments not held in its own name by the Company (MBP-3)	Permanent
8.	Register of Deposit	Permanent
9.	Register of Directors and KMP (Section 170)	Permanent
10.	Register of Records and Documents destroyed	Permanent
11.	Register of Directors' Attendance in Board and Committee Meetings	For a minimum period of 8 financial and may be destroyed thereafter with the approval of the Board
12.	Notice of interest of Directors (MBP-1)	For a minimum period of 8 financial and may be destroyed thereafter with the approval of the Board
13.	The minute books of Board, Committees and General Meetings	Permanent

14.	Minutes of all meetings of the Transferor Company, as handed over to the transferee company under a scheme of arrangement, shall be preserved permanently by the transferee company, notwithstanding that the transferor company might have been dissolved	Permanent
15.	Register of Debenture Holders or any other Security Holders along with the index from the date of redemption of debenture or securities	For a minimum period of 8 years after completion of the relevant transactions
16.	Copies of all annual returns prepared and copies of all certificates and documents required to be annexed thereto from the date of filing with the Registrar	For a minimum period of 8 years
17.	Office copies of Notices, Agenda, Notes on Agenda and other related papers	For a minimum period of 8 financial and may be destroyed thereafter with the approval of the Board
18.	Office copies of Notices, Scrutinizer's Report and other related papers	For a minimum period of 8 financial and may be destroyed thereafter with the approval of the Board
19.	ROC Filings	8 years from the date of the filings
20.	Annual Filings 1. Audited Financial Statements 2. Auditors Reports 3. Annual Returns	Permanent
21.	SEBI/Stock Exchange Records 1. Quarterly/Half-Yearly/Annual/other compliances submitted from time to time 2. Listing Agreement	8 years from the date of submission Permanent
22.	Paid Dividend Warrants	Permanent/ 8 years/ As prescribed by law
23.	Postal Ballot and other related Papers	Permanent/ 8 years/ As prescribed by law

B. Other Records/Documents

Sl. No.	Record/Document Category	Record/ Document Type	Preservation Period
1.	Insurance Records	1. Insurance Policy Execution/renewal Certificate 2. Insurance Claims under various policies	8 years from lapse of the Policy/settlement of claim
2.	Contract/Agreement/Purchase Orders		8 years from the termination of Contract/Agreement/ completion of purchase
4.	Miscellaneous Licenses obtained from Statutory Authorities		Permanent
5.	Property Records	1. Agreements/Contracts 2. Documents relating to acquisition and sale of property	Permanent
6.	Legal	Correspondences with Courts/other statutory bodies regarding any petition/case/suit, etc.	Permanent or the term as may be deemed fit by the Head of Department
7.	Personnel Records	Pension and retirement related statutory records	Permanent
		Payroll, Personnel and HR Records	8 years from the date of termination of employment
8.	Labour Law Statutory Records		Permanent
9.	Finance	1. Audited Financial Statements 2. Auditors Reports	Permanent
		Books of Accounts & Vouchers	8 years following the relevant Financial Year
10.	Cost Audit Records		8 Financial Years following the relevant Financial Year
11.	Regulatory Records		For a minimum period of 8 years

12.	Taxation	<ol style="list-style-type: none"> 1. Registration/Amendment Certificate under various relevant provisions in force. 2. Tax-Exemption Documents and related correspondences 3. Tax Return 	<p>Permanent</p> <p>Permanent</p> <p>8 years or till the time Assessment is completed, whichever is later</p>
13.	Miscellaneous	Records pertaining to various other laws in force	Records maintained under various other laws in force from time to time would be acceptable