

Background

As per Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "SEBI (LODR) Regulations, 2015"), a listed Company is required to have a policy for preservation of documents which has to be approved by the Board of Directors. The documents has been classifying into at least two categories as follows-

- (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;

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to time.

Policy:

Taking into account the aforesaid provisions and other applicable legal provisions, the Policy on Preservation of Documents ("Policy"), to the extent applicable to the Company, is being made as under:

1. Documents whose preservation shall be permanent in nature as per **Annexure-A**;
2. Documents with preservation period of not less than eight years after completion of the relevant transactions, as per **Annexure-B**.
3. The documents referred to above may be maintained in a) physical mode; or b) electronic mode.
4. Custody of all such Registers / Records / Documents, except books of accounts, shall be with the Company Secretary of the Company or such other person as may be specifically authorised by the Board of Directors for the purpose. Custody of books of accounts shall be with the Chief Financial Officer of the Company or such other person as may be specifically authorised by the Board of Directors for the purpose.
5. Back-up of the records maintained in electronic mode may be taken on a periodic basis.
6. The documents after the expiry of the stipulated period for preservation may be destroyed / Extinguished with approval from the Chairman or Managing Director or any other Whole-time Director/Executive Director and a register shall be maintained in an appropriate form, in physical or electronic mode, wherein brief particulars of the documents destroyed shall be entered.
7. The Policy can be modified and or amended with the approval of the Board of Directors only.
8. The policy will be effective from the date of approval of board i.e. February 11, 2021.

STARLITE GLOBAL ENTERPRISES (INDIA) LTD.

ANNEXURE A

A. Documents whose preservation shall be permanent in nature

The Company shall maintain the following documents on a permanent basis:

- a) The original signed and stamped Memorandum of Association and the Articles of Association of the Company;
- b) Copy of Certificate of Incorporation of the Company and thereafter copy of Certificate for change in the name of the Company, if any;
- c) Minutes of General Meetings, Board Meetings and various Committee Meetings;
- d) Register of Member along with Index;
- e) Register of Loans, and Investment by the Company;
- f) Register of Contracts or Arrangements in which directors are interested;
- g) Register of Investments not held in Company's name;
- h) Register of Director and Key Managerial Personnel & their shareholdings; and
- i) Such other registers/ records, as may be prescribed from time to time, required to be maintained permanently

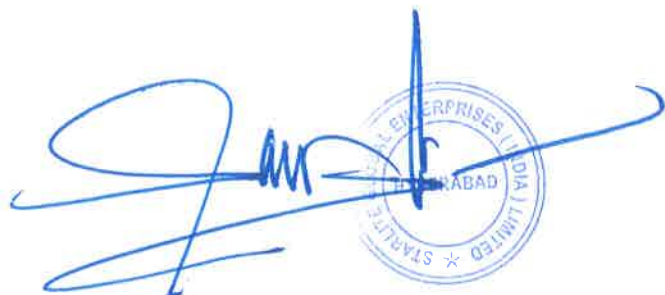


Enterprise India Limited
Hyderabad

ANNEXURE B

B. Documents with preservation period of not less than eight years after completion of the relevant transactions

- a) Books of accounts together with the vouchers relevant to any entry in such books of accounts;
- b) Copies of all Annual Returns filed with the Registrar / Ministry of Corporate Affairs;
- c) Disclosure of interest received from the Directors of the Company in the manner prescribed;
- d) Copies of Notices, Agenda, Notes on Agenda; attendance registers and other related papers of General meetings, Board meetings and various Committee meetings;
- e) Instruments creating a charge or modifying a charge, if any
- f) Register of Deposits accepted or renewed, if any
- g) Tax records- tax records including but not limited to documents concerning tax assessment, tax filings, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final order has been received with respect to any matter which was preferred for Appeal, as the case may be;
- h) Records under FEMA/ Prevention of Money Laundering (Maintenance of Records) Rules, 2005 shall be retained for a period of 10 years;
- i) Legal documents including but not limited to contracts, legal opinions, pleadings, Orders passed by any Court or Tribunal, Judgments, Interim orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters etc.
- j) Property documents, where the rights in such property cease to exist, shall be retained for a period of 8 years after the rights in such property cease to exist. Interim orders shall be retained till a Final order is received or for a period of 8 years whichever is higher.
- k) Contracts, licenses, loan documentation, charge creation documents, guarantees, indemnities, joint ventures agreements, shareholders agreements, other agreements, etc., shall be retained for 8 years after the expiry of the term or its validity.
- l) Press releases shall include, but shall not be limited to, any intimation given to the press regarding financial results, Board and General Meetings, performance of the Company, other statutory announcements. The Company shall retain all press releases for at least 8 years; and
- m) Such other registers / records, such other documents based on the law for the time being in force.



A handwritten signature in blue ink is written over a circular blue stamp. The stamp contains the text "STATE ENTERPRISES (INDIA) LIMITED" around the top edge and "KANABAD" in the center. There is also a small star symbol at the bottom of the stamp.