

Shree Tulsi Online.Com Limited

POLICY FOR PRESERVATION OF DOCUMENTS

PREAMBLE

Regulation 9 of the 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 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 Regulation and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarded after following the due process for discarding the same.

The major objectives of the policy are:

- Identification of statutory registers and other records of the Company which are required to preserved.
- Identification and categorisation of the statutory registers and other records to be maintained either for eight years or permanently.
- Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- After completion of 8 years, for the stator documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the policy or as decided by the Board of Directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

DEFINITIONS

"Act" means the Companies Act, 2013, Rules framed there under and any amendments thereto;

"Board" means the Board of the Directors of the Company.

"Company" means Shree Tulsi Online.Com Limited.

"Documents" refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.

"Electronic Form" means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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.

“Maintenance” means keeping Documents, either physically or in electronic form.

“Policy” means, “Policy on Preservation of Documents.”

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

“Register” means a register maintained under the Companies Act, 2013 or the SEBI Act.

“Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto. Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law;

INTERPRETATION

Terms that have not been defined in this 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.

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 –

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than eight years

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.

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 Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preserved 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 prohibit unauthorised access.

DESTRUCTION OF DOCUMENTS

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

REVIEW OF POLICY

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review.

AMENDMENT

The Board shall have power to amend any of the provisions of the 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 Regulation.

Indicative list

A) Permanent Preservation:

- a. The memorandum and articles of the Company
- b. Common Seal
- c. Affidavit from the subscribers to the memorandum and from persons named as the first directors
- d. Minutes books of Board, General Meeting and Committee Meetings
- e. Statutory Registers
- f. Statutory Forms and disclosures except for routine compliance
- g. Scrutinizers' Reports
- h. Register of Members
- i. 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 charges 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 DISTRUCTION	INITIALS OF THE AUTHORISED PERSON

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