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## POLICY ON PRESERVATION OF THE DOCUMENTS

### TABLE OF CONTENTS

S. No.	Details	Page No.
a)	Scope	3
b)	Definitions	3
c)	Coverage	4
d)	Classification	4
e)	Modes of preservation	5
f)	Custody of the Documents	5
g)	Authority for approval of Policy	5
h)	Authority to make alterations to the Policy	6
i)	Destruction of Documents	6
j)	Conversion of the form in which the Documents are preserved	6
k)	Authenticity	6
l)	Interpretation	7
m)	Annexure - I	7
n)	Annexure - II	9
o)	Annexure - III	9



## 1. Scope

A policy on preservation of Documents (defined below) would ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to **Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”)**, on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

This Policy is effective from **December 01, 2015**.

## 2. Definitions -

2.1 “*Act*” means the Companies Act, 2013.

2.2 “*Applicable Law*” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and the Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

2.3 “*Authorised Person*” means any person duly authorised by the Board.

2.4 “*Board*” means the Board of directors of the Company or its Committee.

2.5 “*Company*” means SAT INDUSTRIES LIMITED.

2.6 “*Current Document(s)*” means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

2.7 “*Document(s)*” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and 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 and does not include multiple or identical copies.



2.8 “*Electronic Record(s)*” means the electronic record as defined under clause (t) of Sub section of section 2 of the Information Technology Act, 2000.

2.9 “*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.

2.10 “*Maintenance*” means keeping Documents, either physically or in Electronic Form.

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

2.12 “*Regulations*” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined here shall derive their meaning from the applicable Law.

### **3. Coverage**

This Policy is intend to guide the Company and its officers on maintenance of any Documents, their Preservation and disposal.

### **4. Classification**

The preservation of Documents shall be done in the following manner:

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is “Current”.
- c) In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance; Provided that generally speaking, a Document may be preserved for a period of 5 years from the date on which the Document was originated.



- An indicative list of the Documents and the timeframe of their preservation is provided in Annexure I

## **5. Modes of preservation**

5.1 The Documents may be preserved in

5.1.1 Physical form or

5.1.2 Electronic Form.

5.2 The officer of the Company required to preserve the Document shall be authorized Person who is generally expected to observe the compliance of requirements of Applicable Law

5.3 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.

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

## **6. Custody of the Documents**

6.1 Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

## **7. Authority for approval of Policy**

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via the Regulations.



## **8. Authority to make alterations to the Policy**

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

## **9. Destruction of Documents**

9.1 Destruction as a normal administrative practice usually occurs because the records are duplicated, Unimportant or for short-term use only. This applies to both Physical and Electronic Documents.

9.2 The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice are listed in Annexure II

9.3 A register of the Documents disposed/ destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/ destruction and the mode of destruction.

9.4 The entries in the register shall be authenticated by the Authorised Person.

- The format of the register has to be in accordance with Annexure III.

## **10. Conversion of the form in which the Documents are preserved**

10.1 The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

10.2 This will be done after obtaining prior approval of the Board.

## **11. Authenticity**

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.



## 12. Interpretation

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

### Annexure - I

➤ Indicative list -

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
<ul style="list-style-type: none"> <li>• The memorandum and articles of the Company</li> <li>• Documents relating to incorporation of the Company</li> <li>• Register of Members</li> <li>• Register of charges</li> <li>• Register under section 186 of the Act, 2013 for Loans/investment/ guarantees or securities provided</li> <li>• Register under section 187 ( investment held in any other person)</li> <li>• Register under section 189 ( register on contracts / arrangements in which directors are interested as per section 184 / 188 of the act</li> <li>• Minutes book of Board / Committee / general meeting, resolutions passed by postal ballot, resolutions passed by circulations.</li> <li>• Licenses, approvals, permissions, deed of indentures, mutation certificates, IPR's certificates or</li> </ul>	<ul style="list-style-type: none"> <li>• Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)</li> <li>• Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)</li> <li>• Register of renewed and duplicate share Certificate ( not less than 30 years)</li> <li>• All notices pertaining to disclosure of interest of directors</li> <li>• All share certificates surrendered to a company (3 years from date of surrender)</li> <li>• Register of deposits (not less than 8 years from the date of last entry)</li> </ul>

<p>any other document which the Managing Director thinks expedient to preserve.</p> <ul style="list-style-type: none"> <li>• Register for destruction or disposal of Documents or Register.</li> </ul>	<ul style="list-style-type: none"> <li>• Instrument creating a charge or modification (8 years from date of satisfaction of such charge)</li> <li>• Attendance Register for Board/ Committee meetings/ General Meetings ( 8 financial years )</li> <li>• Office copies of General Meeting Notices, scrutiniser’s report, and related papers (as long as they remain current or for 8 financial years).</li> <li>• Office copies of Board Meeting Notices, Agenda, notes on agenda and other related papers (8 financial years).</li> <li>• Disclosures prescribed under SEBI (LODR) Regulations, SEBI (PIT) Regulations, SEBI (SAST) Regulations (8 financial years)</li> <li>• Dividend payment records (10 financial years)</li> <li>• Books of Accounts ( 8 financial years)</li> <li>• Annual Reports ( 10 financial years)</li> <li>• Documents of Human Resource department as per relevant applicable law , in other case not less than 8 years)</li> </ul>
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## **Annexure II**

- The following categories of Documents may be destroyed as normal administrative practice:
  - catalogues;
  - copies of press cuttings, press statements or publicity material;
  - letters of appreciation or sympathy, or anonymous letters;
  - requests for copies of maps, plans, charts, advertising material (subject to Clause 9 and 10 of this Policy);
  - facsimiles where a photocopy has been made;
  - telephone message;
  - drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 9 and 10 of this Policy); and
  - routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 9 and 10 of this Policy)

## **Annexure III**

- The format of the register of Documents disposed/destroyed -

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

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