

## THE STATE TRADING CORPORATION OF INDIA LIMITED

### POLICY ON PRESERVATION OF DOCUMENTS

#### 1. PREFACE

The State Trading Corporation of India Limited has adopted the Policy for Preservation of Documents as contained herein. This policy has been framed in compliance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 which mandates all the Listed Companies to formulate and put on website a Policy on Preservation of Documents.

#### 2. PURPOSE

This Policy provides a framework for preservation of documents so as to ensure availability of important records for sufficiently long durations.

#### 3. DEFINITIONS

“**Act**” shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“**Board**” means the Board of Directors of The State Trading Corporation of India Limited, as constituted from time to time.

“**Company**” means “The State Trading Corporation of India Limited”

“**Documents**” means all papers, records, files, books etc., and the like as are maintained or required to be maintained under any law or regulation for the

time being in force and includes documents in physical as well as electronic modes.

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

Any other word(s) included in this policy and not defined herein shall have the same meaning as defined under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

#### 4. THE POLICY

The documents of the Company shall be classified into the following categories:

**Category A : The documents of a permanent nature (Listed in Annexure-1) :**

Documents in this category shall be maintained and preserved permanently by the Company. Any modifications, amendments, additions, deletions in these documents shall also be preserved permanently.

**Category B : The documents to be maintained and preserved for a time period of eight years after completion of the relevant transactions (Listed in Annexure-2) :**

Documents in this category shall be preserved by the Company for a term of eight years after completion of the relevant transactions. Any modifications, amendments, additions or deletions in the documents shall also be preserved for a term of eight years.

Provided further that the Company may keep the documents in any of the categories specified above in an electronic mode.

## **5. ROLES & RESPONSIBILITIES**

The respective Divisional/Branch Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy, in respect of the areas of operations falling under their irrelative charge.

## **6. DESTRUCTION OF DOCUMENTS**

After the expiry of the retention period as stated in this policy, the preserved documents may be destroyed if so decided by the respective Divisional/Branch Head.

A register of the Documents disposed off/destroyed shall also be maintained. It shall state the brief particulars of the documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be duly authenticated.

This applies to both Physical and Electronic Documents.

## **7. DATE OF EFFECT**

This policy will be applicable w.e.f. the date of its approval by the Board of Directors.

## **8. AMENDMENTS**

This policy may be amended anytime with the approval of Chairman and

Managing Director. However replacement of this policy entirely with a new policy may be done with the approval of the Board.

## **9. DISCLOSURE**

Copy of this policy shall be placed on the website of the Company.

## **10. GENERAL**

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Agreement or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy

\*\*\*\*\*

## Annexure 1

### Category A : Documents Whose Preservation Shall be Permanent in Nature

S. No.	Nature of Document(s)
01	Certificates of Incorporation/ Certificates/ Licenses obtained from any statutory authority
02	Certificate for Commencement of Business
03	Memorandum of Association and Articles of Association as originally filed and updated from time to time
04	Agreements made by the Company with Stock Exchanges, Depositories etc.
05	Statutory Registers required under applicable laws
06	Audited financial statements
07	Minutes of General Meetings
08	Minutes of Board Meetings
09	Minutes of various Committee Meetings
10	Material Agreements/Contracts
11	Orders issued by Courts/Statutory bodies
12	Investment Documents/proofs including certificates etc.
13	Any other document as may be required to be maintained permanently in terms of applicable law(s) from time to time.

## Annexure 2

### Category B : Documents With Preservation Period of Eight Years After Completion of The Relevant Transactions

S. No.	Nature of Document(s)
01	Books of Accounts
02	Annual financial statements including annual accounts, directors' report, auditors' report
03	Annual Return(s) along-with certificates and documents annexed thereto
04	Copies of Notices, Agenda papers for meetings of the Board and Committees and General Meetings thereof along-with Notes on Agenda and other related / supporting documents
05	Scrutinizer's Report, Register of Postal Ballot, Postal Ballot forms, office copies of the notices, other related documents
06	Forms and returns filed with MCA / RBI or with any other statutory authority
07	Documents relating to Court cases / CBI cases / Police cases / Civil Suits/ Labour Court Cases / Arbitration cases etc.
08	All consents, notices, disclosures received from the directors and KMPs along with any amendment thereto
09	Correspondences with Departments/shareholders
10	Non-Statutory Registers/Documents
11	Films, Videos, CDs, DVDs, tapes etc. relating to statutory meetings, documents and data under the Companies Act, 2013 and any other applicable laws
12	Instruments creating / modifying / satisfying the charge
13	Insurance Policies/ Claims under various policies
14	Copies of newspaper advertisements and publications relating to all the Statutory Compliances under Companies Act, 2013, SEBI (LODR) Regulations, 2015 and other Applicable Laws
15	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.