



STOVEC

STOVEC INDUSTRIES LIMITED

**POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL
POLICY**

(Effective from 1st December, 2015)

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POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

1. Introduction:

This Policy for Preservation of Documents and Archival Policy is prepared in accordance with Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, in order to ensure proper preservation and maintenance of documents of Stovec Industries Limited. The Policy aims that official records of the Company are preserved in proper manner and in accordance with the requirements of all applicable laws and to ensure that official records no longer needed by the Company are discarded at the proper time and in compliance with law.

2. DEFINITIONS

- A. **“Board of Directors” or “Board”** shall mean the Board of Directors of Stovec Industries Limited, as constituted from time to time.
- B. **“Stovec / Company”** shall mean “Stovec Industries Limited”.
- C. **“Documents”** shall mean and include all papers, records, files, books, summons, notice, order, declaration, form, register, deeds, agreements etc., as required to be maintained under any law or regulation for the time being in force or otherwise.
- D. **“Listing Regulations”** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- E. **“Policy”** shall mean Policy for Preservation of Documents and Archival Policy.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A. Documents whose preservation shall be permanent in nature.
- B. Documents with preservation period of not less than eight (8) years after completion of the relevant transactions.

4. RETENTION PERIOD FOR PRESERVATION OF DOCUMENTS

The retention period for preservation of documents shall be as under:

Sr. No.	Records to be maintained Permanently
1	Statutory Registers
2	Licenses and Permissions
3	Statutory Forms and disclosures except routine compliances
4	Scrutinizer's report
5	Minutes of the Board, Committee(s) of the Board and General Meetings
6	Policies formed by the Company under various laws and regulations
7	Court Orders
8	Land Agreement, Title Deeds, Business/Asset Purchase and/or Sale Agreements
9	Engineering & Technical Drawings
10	All Know-how related documents
11	No-Compete Agreements
12	Trade/Commercial Agreements which are for indefinite period
13	Such other records as may be required under any law from time to time or as felt necessary by the Company.

Sr. No.	Records to be maintained for period up to 8 years
1	Annual Returns under the Companies Act, 2013
2	Attendance Register under the Companies Act, 2013
3	Office copies of Notice, Agenda of Board/Committee(s) of the Board/General Meetings and related papers.
4	Books of Accounts and supporting documents, vouchers and other related accounting records.
5	Routine Contracts, Deeds, Agreements etc.,
6	Tax Records including but not limited to documents concerning payroll, expenses, proof of deductions, TDS, business expenses, accounting procedures and other documents concerning the Company's revenues.
7	Employment documents/records except documents which are statutorily required to be preserved permanently.
8	Documents related to litigations to be maintained for a period of eight years or till the completion of case, whichever is later.

5. ROLES & RESPONSIBILITIES

The respective Head of Department(s) of the Company shall be responsible for maintenance, preservation and destroying of documents in terms of this policy, in respect of the areas of operations falling under the charge of each of them.

6. 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. Where the preservation period of documents is not included in the above identified categories, such period shall be determined by the application of the general guidelines affecting document preservation identified in this Policy, as well as any other pertinent factors.

Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department in writing.

7. MODE OF PRESERVATION AND ARCHIVAL

The documents may be preserved in Physical Form or Electronic Form. In circumstances where the documents are statutorily required to be maintained either in physical form or electronic form, then in such cases the same shall be maintained accordingly. The retention period of preservation of documents shall remain the same irrespective of maintenance of documents in physical format or in electronic format to the extent possible.

Explanation : “**Electronic Form**” means any contemporaneous electronic device such as computer, laptop, compact 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.

All policies, documents and other information not related to any particular period/ event shall be on display on the Company’s website till they are replaced by an updated version, thereafter they will be archived and preserved in a secured server of the Company.

All events or information which, in the opinion of the Board of Directors of the Company, is material and which has been disclosed to the stock exchange(s) in terms of Regulation 30 of the Listing Regulations shall remain on display on the website of the Company for a minimum period of 5 years or such other limit or time as may be prescribed under the Listing Regulations from time to time and thereafter shall be archived for retrieval for a period of 3 years after the same is archived.

8. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Every Department in the Company shall maintain the Register containing particulars of destruction of records from time to time and the said register shall be authenticated by the respective Head of Department.

9. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other employees' related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the website of the Company.

10. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force. The amended version shall be effective from the date it is approved by the Board.

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 this policy and procedures until such time this policy is changed to conform to the new/amended law, rule, regulation or standard.