



# STYLAM INDUSTRIES LIMITED

## POLICY ON PRESERVATION OF DOCUMENTS

### 1. Purpose & Scope

The Securities and **Exchange Board of India** (“SEBI”) vide its Notification dated September 02, 2015 has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Regulations”). In terms of Regulation 9 of Chapter III of the Regulations, each listed company is required to frame a policy on preservation of documents.

This policy shall govern the maintenance and preservation of documents by our Company as per applicable statutory and regulatory requirements.

### 2. Objectives

The main objective of this policy is to ensure that all the statutory documents / records are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations so as to ensure that the documents/records are available in good order and to prevent from being altered, damaged or destroyed and also readily available as and when required by the Company to meet its legal obligation. Some documents / records no longer needed; those are discarded after following the due process for discarding such documents / records.

The major objectives of the policy are:

- a) Identification of statutory registers and other records of the Company which are required to be preserved.
- b) Identification and categorization of the statutory registers and other records to be maintained either for eight years or permanently.
- c) Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- d) After completion of 8 years, for the statutory records and documents which are to be preserved for 8 years, which are to be disposed-off as per the guidelines of this Policy or as decided by the Board of Directors at that time.
- e) To provide support to employees of the Company in understanding their obligations in retaining and preserving the documents and records.

### 3. Definitions

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

**3.2 “Authority”** means any statutory, administrative, arbitral and/or judicial Authority.



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

**3.4** “Company” means “**Stylam industries Limited**”.

**3.5** “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.

**3.6** “Electronic Record(s)” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology **Act, 2000**.

**3.7** “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.

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

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

**3.10** “Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, **2015** including any statutory modifications or re-enactment thereof.

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

## **4. Interpretation**

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, **2013** and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, **2015**.

## **5. Guidelines**

As per Regulation 9 of **SEBI (LODR)** Regulations, every 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-

- a.** Documents whose preservation shall be permanent in nature;
- b.** Documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses **(a)** and **(b)** in electronic mode.

**Accordingly, the company has by way of this policy provided following criteria for preservation of documents:**

- a.** Documents that need to be preserved and retained permanently;

- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) 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 documents pertains to a specific matter, Board of Directors of the Company decided upon presentation of proposal by such departmental head.

An indicative list of the Documents and the time-frame of their preservation is provided in **Annexure- I**

## 6. Mode of Preservation

**The Documents may be preserved in:**

- a) Physical form; or
- b) Electronic Form.

The officials/Departmental heads of the Company are responsible to preserve the documents and records who are generally expected to observe the compliance of statutory requirements as per applicable law.

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 and readily available as and when required by the Company.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person who is responsible for preservation, so as to ensure integrity of the documents and prohibit unauthorized access and unauthorized usage of such documents.

## Destruction of Documents

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure I** may be destroyed by respective departmental head. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under **Annexure-I**.

## 7. Policy Review

The Board of Directors of the Company shall have the right to review/amend the policy from time to time in compliance of law/regulation in force.

## For Stylam industries Limited

Sd/-

**Jagdish Gupta**  
Managing Director  
Place: Chandigarh

## Annexure-I

(This is an indicative list only)

The Documents Preservation Schedule is organized as follows:

### SECTION TOPICS

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Insurance Records
- F. Property Records
- G. Personnel Records

#### A. Corporate Records

Sr.No.	Record Type	Preservation Period
<b>Documents to be preserved permanently</b>		
1	Offer documents	Permanent
2	Statutory Registers	Permanent
3	Register of Members	Permanent
4	Index of Members	Permanent
5	Licenses and Permissions	Permanent
6	Statutory Forms except for routine compliance	Permanent
7	Register of Directors and KMPs and their Shareholdings	Permanent

#### A. Corporate Records

Sr.No.	Record Type	Preservation Period
<b>Other Documents</b>		
9	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
10	Attendance Registers – Board, Committees and General Meetings	8 years
11	Office copies of Notice of General Meetings and related papers	8 years

12	Office copies of Notice, Agenda, Notes on Agenda and other related papers of Board Meeting/Committee Meeting	8 years
13	All notices pertaining to disclosure of interest of directors & KMPs	8 years from the end of the financial year to which it relates
14	Proof of sending Notice of Board & Committee meetings, Agenda, Notes on Agenda, Circular resolution along with its papers, draft minutes, signed minutes and its delivery	3 years
15	Secretarial Audit Report	As per the provisions of applicable laws
16	All documents filed with Stock Exchanges	5 years

### B. Accounts and Finance

Sr.No.	Record Type	Preservation Period
<b>Documents to be preserved permanently</b>		
1	Annual Audit Reports and Financial Statements	Permanent
<b>Other documents</b>		
2	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or after completion of Assessment under Applicable law, whichever is later.
3	Interim Financial Statement	5 years
4	Bank Guarantee	Till expiry of claim period
5	Bill of Entry and Shipping Bills	6 years

### C. Tax Records

Sr.No.	Record Type	Preservation Period
1	Payroll TDS, PF, ESI return and challan applicable on payroll	6 years
2	Tax and Vat Audit	Till assessment is done
3	Tax Returns – Income	Till closure of appeals
4	Sales Tax Records	Till closure of appeals
5	Excise and Service Tax Records	Till closure of appeals

#### D. Legal Files and Records

Sr.No.	Record Type	Preservation Period
1	Payroll TDS, PF, ESI return and challan applicable on payroll	6 years
2	Tax and Vat Audit	Till assessment is done
3	Tax Returns – Income	Till closure of appeals
4	Tax Litigation documents	Till disposal of appeals

#### E. Insurance Records

Sr.No.	Record Type	Preservation Period
1	Insurance Policies for the Company	Permanent
2	Insurance Policies for moveable / immoveable assets, vehicles, etc	2 years from the date of expiry. However, in case of any claims pending in respect of such policies, the same shall be preserved till the settlement of such claims
3	Claim Files	12 months after settlement of the claims

#### F. Property Records

Sr.No.	Record Type	Preservation Period
1	Original Purchase and Sale Agreements / Deeds	Permanent
2	Property Card, Ownership records issued by Government Authority	Permanent

#### G. Personnel Records

Sr.No.	Record Type	Preservation Period
1	Payroll Registers	8 years
2	Bonus, Gratuity and other Statutory Records	8 years
3	Time office Records and Leave Cards	8 years
4	Unclaimed Wages Records	8 years
5	Employees Information Records	3 years