



# **STEEL INFRA SOLUTIONS COMPANY LIMITED**

**Registered Office: D-66, Ground Floor, Hauz Khas New Delhi-110016**

**CIN: U27300DL2017PLC324842**

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## **POLICY ON PRESERVATION OF DOCUMENTS**

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Version 1.0

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## **INTRODUCTION**

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations” or “Regulations”] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

## **SCOPE**

This policy shall govern the maintenance and preservation of Statutory Documents which are required to be maintained by the Company under the Companies Act, 2013 and Rules made there under. Company’s other documents may be maintained according to requirement of applicable laws and/ or discretion of the management

## **OBJECTIVE AND PURPOSE OF THE POLICY**

The main objective of this policy is to ensure that all the statutory documents maintained under the Companies Act, 2013 are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations.

The major objectives of the policy are:

- Identification of Statutory Registers and other records of the Company which are required to be preserved.
- Identification and categorization 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 statutory documents which are to be preserved for 8 years only may be disposed off 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 and the Rules framed thereunder, as amended from time to time.

“Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

“Chief Compliance Officer” shall mean any person responsible for all statutory and legal compliances of the Company.

**‘Company’** means Steel Infra Solutions Company Limited (Formerly known as Steel Infra Solutions Company Private Limited and Steel Infra Solutions Private Limited).

**“Current”** means running matter or whatever is at present in course of passage.

**‘Key Managerial Personnel (KMP)’** means as defined in the Act.

**"Board of Directors “or “Board”,** means the collective body of the Directors of the company;

**“Book and Paper”** and **“book or paper”** includes books of account, deeds, vouchers, writings, documents, minutes and registers maintained on paper or in electronic form..

**“Books of Account”** includes records maintained in respect of

- (i) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place;
- (ii) all sales and purchases of goods and services by the company;
- (iii) the assets and liabilities of the company; and
- (iv) the items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section

**“Policy”** or **“This Policy”** means, **“Policy on Preservation of Documents.”**

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

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

**“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.

## **GUIDELINES**

Regulation 9 of Listing Regulations, 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:

- 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:

Accordingly, 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 4 years from the date on which the Document was originated.

### **MODES OF PRESERVATION**

The Documents may be preserved in –

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

The official 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.

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.

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.

### **DESTRUCTION OF DOCUMENTS:**

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.

The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorized 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.

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. The entries in the register shall be authenticated by the Authorized Person.

### **REVIEW**

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.