

Policy on Preservation of Documents

SAGAR TOURIST RESORTS LIMITED

(CIN: L55101HP1987PLC007312)

POLICY ON PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of the SEBI (LODR) Regulations, 2015]

1. PREAMBLE:

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, (hereinafter referred to as "SEBI Listing Regulations"), the Board of Directors of a listed entity is required to have a Policy on Preservation of Documents. Further, under Regulation 30(8) of the SEBI Listing Regulations, events and information disclosed under the SEBI Listing Regulations shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the Archival Policy of the listed entity, as disclosed on its website. Pursuant to the requirements stated above, Sagar Tourist Resorts Limited (the "Company") has framed and adopted the Policy on Preservation of Documents (the "Policy").

2. CLASSIFICATION OF RECORDS:

The Regulation 9 of the SEBI Listing Regulations mandates that the Company shall have a Policy on 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; and
- (b) Documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the Company may keep documents specified in Clauses (a) and (b) above in electronic mode.

Policy on Preservation of Documents

3. TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION:

The Company shall maintain and preserve documents as specified hereunder:

Category (A):

The documents of permanent nature (listed in **Annexure - 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

Category (B):

The documents of the Company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in **Annexure - 2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the documents, shall also be preserved for a term not less than eight years.

For the purpose of this policy, document may include the following:

- 1) “**Book and Paper**” and “**Book or Paper**” as defined in Clause 12 of Section 2 of the Companies Act, 2013;
- 2) “**Books of Account**” as defined in Clause 13 of Section 2 of the Companies Act, 2013;

Policy on Preservation of Documents

- 3) “**Document**” as defined in Clause 36 of Section 2 of the Companies Act, 2013; and
- 4) “**Register of Company**” as defined in Clause 74 of Section 2 of the Companies Act, 2013.

Further, the Company may deemed fit and possible from time to time maintain above mentioned documents in electronic form to the extent possible.

Notwithstanding anything contained in this policy in case of dispute with tax authorities or government authorities, records and documents relating to dispute will be preserved till the settlement of dispute or eight years whichever is later.

Certain key relevant points as per the Companies Act, 2013 and relevant Rules made there under disclosed as below:

Pursuant to Section 128(5) of the Companies Act, 2013 (the “Act”), the books of account of every Company relating to the period of not less than eight financial years immediately preceding a financial year, or where the Company had been in existence for a period less than eight years, in respect of all the preceding years together with the vouchers relevant to any entry in such books of accounts shall be kept in good order.

Provided that where an investigation has been ordered in respect of the Company, the Central Government may direct that the books of account may be kept for such longer period as it may deem fit.

Section 94 of the Companies Act, 2013 read with Rule 15 of the Companies (Management and Administration) Rules, 2015 prescribes certain period of maintenance of certain types of Registers, Returns, etc.

Policy on Preservation of Documents

Annexure - 1:

Documents where Preservation shall be Permanent in nature:

Permanent:

- i) Certificate of Incorporation;
- ii) Certificate of Commencement of Business;
- iii) Memorandum and Articles of Association;
- iv) Agreements made by the Company with Stock Exchanges, Depositories, etc.;
- v) Register of Members along with the Index;
- vi) Register of Loan and Investments;
- vii) Register of Directors & Key Managerial Personnel and their shareholdings;
- viii) Register of Investments not held in the Company's Name;
- ix) Register of Charges;
- x) Register of Renewed and Duplicate Certificates;
- xi) Register of Contracts or Arrangements in which Directors are interested;
- xii) Statutory Forms and disclosures except routine compliances;
- xiii) Minutes of the Board Meeting, various Committee Meetings and General Meetings;
- xiv) Scrutinizer's Report;
- xv) Licences and Permissions;
- xvi) Policies formed by the Company under various Laws and Regulations;
- xvii) Court Orders;
- xviii) Such other Registers / Records, as may be prescribed from time to time, required to be maintained permanently.

Policy on Preservation of Documents

Annexure - 2:

Documents with Preservation, period of not less than Eight Years after completion of the relevant transactions:

- i) Register of debenture holders or any other security holders along with the index;
- ii) Annual Returns and copies of all certificates and documents required to be annexed thereto;
- iii) Books of Account and supporting documents, vouchers, records, contracts, deeds, agreements, etc.
- iv) All notices under Section 184 of the Companies Act, 2013 read with Rule 9 of the Companies (Meetings of Board and its powers) Rules, 2014.
- v) Agenda Papers, Notice for Board Meeting, Committee Meeting, General Meeting and other related papers;
- vi) Notice of disclosure of interest from Directors and Key Managerial Personnel;
- vii) Register of Deposits;
- viii) Register of Proxies;
- ix) Register of Transfer and Transmission;
- x) Instrument creating a charge or modification thereon;
- xi) Such other Registers / Records as may be prescribed, from time to time.

Others: As per applicable laws.

Policy on Preservation of Documents

4. MODE OF PRESERVATION:

- 1) The documents may be preserved in Physical Form or Electronic Form. The retention period of preservation of documents shall remain the same irrespective of maintenance of documents in physical format or in electronic format.

Explanation: “**Electronic Form**” means any contemporaneous electronic devices 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.

- 2) All policies, documents and other information related to any particular period / event shall be displayed on the Company's website till they are replaced by an updated version, thereafter they will be archived as per Archival Policy of the Company.
- 3) All events or information which, in 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 SEBI Listing Regulations shall remain on display on the website of the Company as per Archival Policy of the Company.

5. RESPONSIBILITY OF PRESERVATION OF DOCUMENTS:

Each Head of the Department of the Company are obligated to ensure the preservation of documents pertaining to their areas of responsibilities in accordance with the Applicable Laws / Regulations.

Policy on Preservation of Documents

6. APPLICABILITY:

This Policy, duly approved by the Board of Directors on 05th November 2021, applicable with effect from the 31st day of May, 2021 and modifications shall take effect from the date stated therein.

The Policy is to be disclosed on the website of the company.
