

SATIA INDUSTRIES LIMITED POLICY FOR PRESERVATION OF DOCUMENTS

PREFACE

Satia Industries Limited ("The Company") is governed by the Companies Act, 2013 ("The Act"), the Rules and Regulations framed thereunder by Ministry of Corporate Affairs ("MCA") and Securities and Exchange Board of India ("SEBI") (Listing obligations and Disclosure Requirements) Regulations, 2015 ("LODR Regulations"). Regulation 9 of LODR Regulations, has mandated listed entities to frame and adopt a Policy for Preservation of Documents (hereinafter referred to as Policy)

Objective

The objective of this Policy is to classify the documents, records and registers of the Company which are required to be preserved are classified into two categories as follows-

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

a] Documents whose preservation shall be permanent:

The following documents shall be preserved on permanent basis:

S. No.	Name of the Document	Regulation
1	Minutes of the Board Meetings, General Meetings and Committee meetings	Section 118 of the Act read with Rule 25 of the Companies (Management and Administration) Rules,
2	Register of members, debenture holders and other security holders along with index of members	Section 88 of the Companies Act 2013 read with 3 & 4 the Companies (Management and Administration) Rules, 2014
3	All the documents filed at the time of Incorporation which includes Memorandum and articles of the company duly signed by all the subscribers along with Registration Certificates/ Certificate of Incorporation/ Change of name etc. (as amended from time to time) as issued by Registrar of Companies.	Section 7 and 15 of the Companies Act 2013.



Such other registers / documents as may be required to be maintained permanently under the Act.

b) Preservation of Documents for 8 years:

The following Documents shall be preserved for 8 years:

S. No.	Name of the Document	Regulation
1.	Statement under Grievance Redressal Mechanism	13(3)
2.	Corporate Governance Report	27(2)a
3.	Statement of deviation or variation in use of issue proceeds	32(1)
4.	Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI	7(3)
5.	Compliance Certificate w.r.t. Transfer or transmission or transposition of securities within 30 days	40(10)
6	Listing Fees	14
7	Intimation of appointment of Share Transfer Agent	7(5)
8.	In-principle approval prior to issue of securities	28(1)
9.	Prior Intimations of Board Meeting for financial Result	29(1)a
10.	Prior Intimations of Board Meeting for Buyback, voluntary delisting etc	29(1)(b), 29(1) (c), 29(1)(d), 29(1) (e) and 29(1) (f)
11.	Prior Intimations of Board Meeting for alteration in nature of securities	29(3)
12.	Disclosure of Price Sensitive Information	30(6)
13.	Shareholding Pattern prior to listing of securities	31(1)a
14.	Record date or Date of closure of transfer books	42(2)
15.	Record date for declaring dividend and /or cash bonus	42(3)



S. No.	Name of the Document	Regulation
16.	Change in name of listed entity	45(3)
17.	Disclosure of information or events	30
18.	Reconciliation of Share Capital Audit Report	76 of SEBI (Depositories and Participants) Regulations, 2018
19.	Disclosures under Code of Internal Procedures and Conduct For Regulating, Monitoring And Reporting Of Trading By Insiders	7
20.	Register of debenture holders or any other security holders along with index	Rule 15(2) of Companies (Management and Administration) Rules, 2014
21	Proxy Register	Para 6.9 read with Para 18.2 of SS-2
22.	Board and Committee Meeting Notices	Section 173 of the Companies Act 2013 Para 8.2 of SS-1
23.	Attendance Sheets of Directors / Invitees	Para 4.1.7 of SS-1
24	Leave of absence request letters	Para 4.1.7 of SS-1
25.	Agendas and Notes on Agendas	Para 8.2 of SS-1
26.	Annual returns and all certificates and documents related thereto	Section 94(1) of the Companies Act 2013 read with Rule 15(3) of the Companies (Management and Administration) Rules. 2014
27.	Books of account of every company together with the vouchers relevant to any entry in such books of account.	Section 128(5) of the Companies Act 2013
28.	Instrument creating a charge or modification thereon	Section 85 read with rule 10 (4) of the Companies (Registration of Charges) Rules, 2014.



PRESERVATION OF DOCUMENTS

The documents specified in Item Nos. a & b may be kept in electronic mode.

LIMITATION AND AMENDMENT

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