

Policy on preservation and archival of documents & record

Version	Board Approval Date
V0	

Sresta Natural Bioproducts Limited CIN: U01122TG2004PLC042837

Archival Policy

1. Background

1.1 The Securities and Exchange Board of India ("SEBI") has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"). regulation 9 of the SEBI Listing Regulations mandate the Company to frame a policy on preservation of documents, which is to be approved by its Board of directors (the "Board").

Regulation 30(8) of SEBI Listing Regulations mandates the Company to formulate a Policy for preservation and archiving of documents.

- 1.2 The Board has adopted the following Policy on Preservation & Archival of Documents & Records (the "Policy") and the Board may amend this Policy from time to time.
- 1.3 Sresta Natural Bioproducts Limited (the "Company") website is hosted on the domain www.sresta.com (the "Website").

2. Objective

The policy is formulated to retain events or information which has been disclosed to Stock Exchange(s), on the website of the Company, for such period so as to satisfy statutory or regulatory requirements.

3. Scope or Coverage

The Policy covers all relevant Documents and Records generated during the course of operations of the Company.

The policy will be applicable to the Company, its subsidiaries and joint ventures.

The concerned departmental head will be responsible for the maintenance, preservation and destruction of Documents and Records pertaining to the respective Department.

4. Archival Policy

Preservation:

A. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the secretarial standards and the SEBI Listing Regulations and other applicable law, rules, regulations (collectively, called "Statutory Provisions") and internal policies of the Company, in force.

- **B.** The relevant head of departments of the Company shall be responsible to ensure the maintenance and preservation of Documents and Records.
- C. Documents and Records which are required to be preserved by virtue of applicable laws and regulations shall be preserved either permanently or for such periods as may be mandated by applicable laws from time to time.

Documents to be preserved permanently:

The Company shall preserve the documents which are required to be preserved permanently in accordance with the provisions of laws, rules, regulations, guidelines, circulars, and notifications etc., as may be applicable to the Company from time to time, including the following:

- (i) The original signed and stamped memorandum of association and the articles of association of the Company;
- (ii) Certificates of incorporation;
- (iii) Minutes of general meetings, board meetings and various committee meetings;
- (iv) Register of members along with index;
- (v) Foreign register of members, if any;
- (vi) Register of loans, guarantee, security and acquisition made by the Company;
- (vii) Register of investments not held in its own name by the Company, if any;
- (viii) Register of contracts with related party and contracts and bodies etc., in which the directors of the Company are interested;
- (ix) Register of charges;
- (x) Registers of renewed and duplicate share certificates;
- (xi) Register of directors and key managerial personnel;
- (xii) Register of inter corporate loans and investments; and
 - (xiii) Intellectual property rights owned and related documents including, but not limited to copyrights, trademarks, patents, and industrial designs.

Documents to be preserved for at least eight financial years:

The Company shall preserve the documents which are required to be preserved for not less than 8 years in accordance with the provisions of laws, rules, regulations, guidelines, circulars, and notifications etc., as may be applicable to the Company from time to time, including the following:

- (i) Books of accounts together with the vouchers relevant to any entry in such books of accounts;
- (ii) Register of debenture holders (including foreign register of debentures) or register for any other securities issued by the Company;
- (iii) Copies of all annual returns;

- (iv) Disclosure of interest received from the directors of the Company in the manner prescribed;
- (v) Attendance registers, notices, notes on agenda and other related papers of general meetings, board meetings and various committee meetings;
- (vi) Instrument creating a charge or modifying a charge, if any;
- (vii) Changes to the memorandum of association and the articles of association, if any; and
 - (viii) Register of deposits accepted or renewed, if any.
- **D.** Documents and Records which are required to be preserved for a period of not less than 8 (eight) years

after completion of the relevant transactions (or such time period stipulated in the Listing Regulations and other laws and statutes applicable to the Company from time to time) shall be preserved for such stipulated time period as specified by the relevant head of departments of the Company from time to time.

5. MODES OF PRESERVATION

- A. The Documents may be preserved either in physical form or electronic form.
- B. The relevant head of departments of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person).
- C. The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- D. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure the integrity and confidentiality of the Documents and prohibit unauthorized access.
- E. The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

6. Dissemination of Policy

This Policy shall be hosted on the website of the Company [●] (website of Company)

7. Effective Date

The Policy, as approved by the Board of Directors, shall be effective from the date of listing of the equity shares of the Company.

8. COMPLIANCE

- a. All employees of the Company are required to comply with the provisions of this Policy and the guidance manual. Failure to comply by any employee of the Company with this Policy and the guidance may result in disciplinary action by the Company, including suspension or termination of employment.
- b. Any queries regarding this Policy may be referred to the compliance officer of the Company, who is in charge of administering, enforcing and updating this Policy.