

# **Sheraton Properties & Finance Limited**

## **Policy for Preservation of Documents**

**(W.E.F. 01<sup>st</sup> February, 2016)**

**1. PREAMBLE:**

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 [“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.

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

**2. GUIDELINES:**

Pursuant to aforesaid Regulation 9, 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 which will be preserved for a minimum period of 8 years after completion of the relevant transaction(s).

Accordingly, the Company has classified the documents to be preserved in the following manner:

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

The following documents shall be preserved permanently:

- Common Seal.
- Minutes Books of Board Meetings, General Meetings, Committee Meetings and Class Meetings.
- Statutory Registers including Register of Members and index thereof, if applicable.
- License and Permissions.
- Statutory Forms and disclosures of substantive nature except for routine compliance.
- Memorandum of Association and Articles of Association.

**b. Documents that need to be preserved and retained for a minimum period of 8 years post completion of transaction;**

The following documents shall be preserved and retained for a minimum period of 8 years only:

- Annual Returns and Certificates attached thereto.
- Board Notice alongwith Agenda Papers/ Back up Papers and supporting documents thereto.
- Attendance Register for Board, General Meeting(s) and Committee Meetings.
- Office copies of Notice of General Meeting and related papers etc.
- All notices pertaining to disclosure of interest of Directors and their disqualification etc.
- Instrument creating charge/ modification/ satisfaction with Bank(s) related to loan/ funding facilities etc.
- Books of accounts, financial statements, vouchers, Bills and other allied documents thereto.
- Register of debenture holders or any other security holders and index

thereto.

- Statutory Forms and disclosures being of routine compliances and being non-substantive and general forms etc.

- c. **Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as may be applicable to the Company from time to time, whenever defined;**
- d. **However when there is no such requirement of preserving any document for particular period as per applicable law, then for such period as the document pertains or as the concerned Officer decides.**

The Documents may be preserved in physical form or electronic form entirely depending upon the convenience and requirement of the Company.

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.

### 3. **DESTRUCTION OF DOCUMENTS:**

In consonance with this Policy, the Authorized Directors of Company may direct the concern person from time to time to destroy the documents which are no longer required. The details of the documents destroyed shall be recorded in the Register for Disposal of Records in the format prescribed in Annexure–A. The entries in the register shall be authenticated by the Authorised Person.

### 4. **POLICY REVIEW:**

This policy shall is subject to review by the Board of Directors from time to time so that the policy remains compliant with applicable legal requirements.

## **For Sheraton Properties & Finance Limited**

Sd/-

Sd/-

**Aditya Srivastava**  
Chairman  
(DIN: 07250865)

**Jayesh B. Bhansali**  
Director  
(DIN: 01062853)

Date: 01<sup>st</sup> February, 2016

Place: Mumbai

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**ANNEXURE – A**

Specimen format of the register of documents disposed of/destroyed

<b>Sr. No.</b>	<b>Particulars of documents destroyed</b>	<b>Details of applicable legal provisions, if any</b>	<b>Date and mode of destruction of documents</b>	<b>Initials of the Authorized Person/ Officer in whose presence document was destroyed</b>