

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

[Under Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

Introduction:

This policy attempts to preserve and maintain documents of the organization. During the course of business, the Company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organization. In order to preserve such documents, the Company needs to implement a well-considered, well-documented plan to ensure that they remain in good condition over a period of time. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

Purpose of the policy:

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents. This policy seeks to ensure that the Company's business is adequately documented that are then managed in accordance with best practice. Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company is required to formulate a policy for preservation of documents.

In terms of Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company is required to formulate an archival policy for all disclosures of events/information to the Stock Exchanges in terms of the Company's Policy for determination of materiality of events or information.

In compliance to the aforesaid regulation, The Board of Directors (the "Board") of Asian Star Company Limited (the "Company") has adopted a policy with regard to preservation and archival of Documents.

Objective:

This policy sets the standard for classifying, managing and storing of records of the Company. The purpose of this policy is to establish a framework for effective record management and the process for subsequent archival of such records.

Preservation of documents:

Attached as **Annexure A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents.

It shall be the responsibility of the concerned head of department to keep the annexed Documents Preservation schedule updated from time to time to ensure that it is in compliance with the various Acts/Rules/Regulations applicable to their respective Departments.

The documents mentioned above can be maintained by the Company in physical or electronic, if permitted under the applicable Acts/Rules/Regulations.

In the event of any contradiction in the Documents Preservation Schedule and the statutory provisions, the period provided for in the statutory provisions shall prevail.

Destruction of documents:

After the expiry of the preservation period specified in the annexed Documents Preservation Schedule, such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval of Chairman & Managing Director of the Company. The records of the documents destroyed shall be maintained by the concerned department in the format prescribed at **Annexure B** and shall be produced whenever required by the concerned authority/auditors.

In case any specific procedure is prescribed under applicable Act/Rule/Regulation for destruction of the documents, the same shall be followed by the Company.

Where the Company has been served with any notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed of finally.

Archival policy:

The Company shall disclose on its website all such events and information which have been disclosed to the Stock Exchanges under Regulation 30 of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a period of five years from the date of disclosure to the Stock Exchanges.

After five years, such disclosures shall be removed from the Company's website and preserved by the Company. Such disclosures shall be preserved in a logical manner viz. as per nature/date of the disclosure, etc. to facilitate easy retrieval as and when required. The disclosures shall be preserved in a non-editable format for a further period of five years ("Preservation Period"). After the Preservation Period, such archives would be deleted/removed after obtaining approval of the Chairman & Managing Director.

Disclosures:

The Company shall disclose this Policy on its website.

Review of the policy:

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. The Company shall be free to devise and implement any supplementary or other policies and guidelines in respect hereof for better implementation of this Policy.

ANNEXURE – A

DOCUMENTS PRESERVATION SCHEDULE

A: Corporate Records

❖ Documents whose preservation shall be permanent in nature:

1. All documents and Information originally filed with ROC for Incorporation of Company;
2. Memorandum of Association and Articles of Association as originally filed and updated from time to time;
3. Minutes of Board Meeting/General Meeting/Committee Meetings;
4. Register of Members and Index of Members (Maintained by Registrar & Share Transfer Agent);
5. Register of Directors and Key Managerial Personnel and their shareholding;
6. Register of renewed and duplicate share certificate (Maintained by Registrar & Share Transfer Agent);
7. Register of Charges;
8. Register of Contracts with related party and Contracts and Bodies etc., in which Directors are interested;
9. Register of Loans, Guarantees, Security and Investments made by Company;
10. Register of Investments not held in its own name by the Company;
11. Register of destruction of documents;
12. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

❖ Documents with preservation period of not less than eight years after completion of the relevant transactions:

1. Books of Accounts;
2. Register of Directors' Attendance;
3. Register of Proxies;
4. Register of Buy-back of Securities;

5. Register of Deposits;
6. Disclosure of Director's Interest;
7. Annual Return along with annexures/certificates;
8. Office copies of Notice of Board Meeting /Committee Meeting, Agenda, Notes on Agenda and other related papers;
9. Office copies of Notice of General Meeting and related papers;
10. Register and Index of Debenture holders;
11. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

B: All other documents

All other documents of the Company shall be maintained in compliance with the requirements of the applicable laws.

ANNEXURE - B

Destruction of Documents

Particulars of documents destroyed	Date and mode of destruction with the initials of the Head of Department