

SASTASUNDAR VENTURES LIMITED
(Formerly Known as Microsec Financial Services Limited)

POLICY ON PRESERVATION OF DOCUMENTS

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

1. PREAMBLE:

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (Hereinafter called as “**The Regulations**”) every listed Company shall frame a policy on preservation of documents. This policy *inter alia* provides for preservation of documents where such preservation shall be of permanent nature as also documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

1.2 OBJECTIVE:

The objective of this Policy is to ensure that the documents / records required to be prepared and disclosed to the stock exchanges pursuant to the Listing Regulations (“the Listing Records”), whether physically or in electronic form be preserved for a minimum period of 8 years from the date of completion of relevant transaction.

Further, if any other applicable law requires the preservation of any of these Listing Records for a longer period or permanently, then those shall be preserved / maintained accordingly.

This policy is framed as per requirement of Regulation 30 (8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

2. DEFINITIONS

- a) Act: “Act” means the Companies Act, 2013 including any amendment or modification thereof.
- b) Board: Board means Board of Directors of the Company
- c) Company: “Company” means Sastasundar Ventures Limited.
- d) Compliance Officer: “Compliance Officer” means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- e) Committee: The Committee shall mean the Committee of the Board of Directors or any other Committee so constituted
- f) Director: “Director” means a person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed as a Director in the Company.
- g) Document: “Document” means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or

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kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

- h) Employees: “Employees” shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.
- i) Key Managerial Personnel: “Key Managerial Personnel” shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.
- j) Regulations: “Regulations” shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015
- k) Secretarial Standards: “Secretarial Standards” means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- l) Stock Exchange or Exchanges: “Stock Exchange or Exchanges” shall mean BSE Limited and National Stock Exchange of India Limited
- m) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

3. GOVERNING LAWS

This policy shall be governed by the Companies Act 2013, SEBI Act, Rules and Regulations, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

4. PLACE OF PRESERVATION / MAINTENANCE

The Listing Records shall be preserved / maintained at the Corporate Office of the Company unless any other law requires it to be maintained at the Registered Office or any other place, in which case the same shall be kept at such place.

5. CLASSIFICATION OF DOCUMENTS

- 1 Documents shall be classified in the following categories
 - a) Mandatory under governing laws
 - b) Non-Mandatory
- 2 Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.

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- 3 All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
- 4 Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

6. Manner of Preservation of Documents:

a) Methodology of preservation:

The Company shall primarily utilise any one / combination of the following methods in preserving the records:

1. Department or Function wise
2. Subject or topic wise
3. Chronologically
4. Such other method as the Department heads may consider appropriate, as to fulfil the following objectives:
 - i) to meet the legal standards for protection, storage and retrieval
 - ii) to optimize the use of space and minimise the cost of records retention.

b) Storage and Security Condition:

The record should be stored in conditions that are secure and clean with low risk of damage. Records of non-paper format shall require special storage conditions and handling process, after taking into account their specific charter. Similarly, records of continuing value and requiring longer preservation shall require a higher quality of storage.

7. Duration of Preservation:

The Minimum retention requirement of the different categories of the Company records is provided in the Retention Schedule which is disclosed by way of annexure to the Policy.

The Retention Schedule has classified the records in the following categories:

- a. The document whose preservation shall be permanent in nature
- b. Documents to be retained during active employment
- c. Documents to be retained for not less than eight (8) years from the date of termination of employment.
- d. Document with preservation period of not less than 8 years after completion of the relevant transactions
- e. Document with preservation period of not less than 8 years from the date of complaint resolved.
- f. Document with preservation period of not less than 8 years from the date of filing with Registrar
- g. Document with preservation period of not less than 8 years from the lapse of the Policy/ settlement claim
- h. Document with preservation period of not less than 8 years from termination of contract/ Agreement/ completion of purchase.

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- i. Document with preservation period of not less than 8 years from the Financial year in which the latest entry is made of repayment or renewal of any deposit of which particulars are contained in the Register.
- j. Document whose records maintained under various other laws in force from time to time would be applicable.

8. Accessibility and Confidentiality:

Records should be made accessible to all the concerned employees of the Company and other outside users not belonging to the Company, with permission of the respective Departmental heads. However, the Directors of the Company and the Company Secretary shall have complete access to all the records.

Any record containing confidential data will be made accessible only after the permission of the Board of Directors of the Company.

9. Manner of Public Disclosure of records published on the website of the Company.

The documents required to be published on the website of the Company shall be hosted under the "Investor Relation" section of the Website till the stipulated duration of time as provided under the various laws in force or for such longer time as the Directors of the Company or the Company Secretary so desire.

Thereafter the same shall be transferred to the "Past Information / Events" section till such time as may be instructed by the Directors of the Company or the Company Secretary. However, in case of updation in disclosure of such published records, the older records can be removed from the website of the Company as per the will of the Directors or the Company Secretary, provided it does not lead to contravention of any law(s) or regulation(s) in force.

10. Destruction of Records:

Records which no longer serve a useful purpose should be destroyed. This would free filing equipment for storage or records currently needed in the conduct of business. Records destruction can also improve operational efficiency by reducing the quantity of records to be searched in order to locate the needed information.

However, it be noted that all the confidential records shall be destroyed only after the approval of the Directors of the Company.

11. Amendments to the Policy:

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

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SI No.	Record Category	Record Type	Minimum Retention requirement.
1	Board Meeting & Committee Meeting	1. Agenda 2. Internal Audit Report 3. Board Minutes 4. Committee Minutes 5. Adopted Policies 6. Attendance Registers 7. Other miscellaneous documents	Permanent
2	General Meeting	1. Register and Index of Members 2. Minutes 3. Attendance Register	Permanent
3.	Other Secretarial Records	1. Incorporation/ conversion/ Business Commencement 2. Memorandum and Articles of Association 3. Common Seal 4. Annual Report 5. Various Statutory Register under Companies Act, 1956 and /or Companies Act, 2013 6. Share Transfer / transmission etc. Correspondence with the Registrar. 7. Correspondence with statutory bodies	Permanent
		1. Non statutory Register under Companies Act, 1956 and /or Companies Act, 2013 2. Correspondence with shareholders 3. Copies of all annual return alongwith certificates & documents required to be annexed thereto	8 years
4	Insurance Records	1. Insurance Policy 2. Insurance Claim under various Polices	8 years
5.	Contract / Agreements/ Purchase Orders	1. Renewal 2. Modification 3. Termination of : Contract/ Agreement/ Purchase orders	8 years of termination
5.	SEBI & Stock Exchange Records	1. Correspondence with statutory Bodies 2. Quarterly/ half yearly/ annual compliances submitted from time to time. 3. Listing Agreement	Permanent

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SI No.	Record Category	Record Type	Minimum Retention requirement.
		4. Disclosure in news papers	
6.	Various licenses obtained from various authorities		Permanent
7.	Property Records		Permanent
8.	Legal	Correspondence with courts / other statutory bodies regarding any petition / case / suit etc.	Permanent
9.	All confidential Agreement of non-disclosure nature		Permanent
10.	Personnel Records	1. official personnel files of Active employees	
		2. Official personnel files of inactive employees	8 years from the date of termination of employment
11.	Labour Law records	1. Registration and renewal of certificate under various acts relating to labour laws 2. Maintenance of various Registers under the various acts in force read with rules made thereunder , relating to labour laws	Permanent
12	Finance	1. Audited Financial Result 2. Audit Report	Permanent
		Books of accounts and vouchers	8 financial years following the relevant Financial Years
13	Taxation	1. Correspondence with the Statutory bodies 2. Registration / Amendment Certificate under various relevant provisions in force	Permanent
		Preservation of specific books of accounts	8 financial year following relevant Financial year