

SHANTNU INVESTMENTS (INDIA) LIMITED

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DOCUMENT PRESERVATION POLICY

INTRODUCTION

A document preservation policy involves the systematic identification, categorization, maintenance, review, retention, and destruction of documents received or created in the course of business. The policy contains the guidelines how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed off if no longer needed, and how should be accessed or retrieved when they are needed as per the rules made under the law

PURPOSE

This policy is framed as per requirement of Regulation 9 of SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015

PREAMBLE

The Board of Directors (Board) of Shantnu Investments (India) Limited ("the Company") has adopted the following policy and procedure with regard to preservation of documents as defined below. The Board will review and may amend this policy from time to time.

OBJECTIVES:

To determine preservation period for records/documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Company's own information retrieval needs
- Statutory requirements under respective statutes.
- Litigation requirements
- To ensure easy retrieval.
- To ensure that unwanted records do not occupy storage space.

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.

SCOPE:

This policy is applicable to all departments of the Company. It ensures that the Company maintains its documents as per various statutory requirements and is subject to the same degree of confidentiality and care.

DEFINITIONS:

"Act" means the Companies Act, 2013.

"Company" means "Shantnu Investments (India) Limited".

"Board of Directors" or "Board" means the Board of Directors of Shantnu Investments (India) Limited, as constituted from time to time.

"Policy" means policy on Preservation of Documents.

"Listing Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

"Compliance Officer" The Key Managerial Person appointed by the Board of Directors of the Company as the Compliance Officer for the purpose of these regulations from time to time.

"Rules" means Rules made under the Companies Act, 2013.

"Regulation" means Regulation made under SEBI Act.

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

The Board of Directors shall decide necessity of preservation of documents permanently from time to time as required under the Act and Regulation.

Documents/records related to accounts, secretarial department:

Notwithstanding anything contained herein the Act, SS-1 and SS-2 the following documents/ records maintained under the Act, Rules and Regulation shall be preserved permanently and hosted on the website of the Company:-

- a., Duly signed Financial Statements along with annual reports.
- b. Annual Returns filed with the ROC.
- c. Minutes of all the General Meetings.
- d. Disclosures made under the SEBI Insider and Takeover Regulations and the SEBI (LODR) Regulations, 2015 to the Stock Exchange from time to time.
- e. Memorandum and Articles of Association of the Company as may be amended from time to time.
- f. Shareholders and Joint Venture agreement.
- g. Letter of Offer related to public issue, right issue, further issue, buyback offer, etc.
- h. any others document, if Board of Directors may deem think fit.

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS COMPLETION OF THE RELEVANT TRANSACTION

1. Notice of the Board meetings given to the Stock Exchange for considering matters relating to pre-intimations required to be submitted to the Stock Exchange.
2. Date for the Book Closures and Record dates for various purposes as may be decided by the Company from time to time.
3. Quarterly and half yearly and annual financial results of the Company;
4. Quarterly Shareholding Pattern including details for pledge of shares and any changes therein.
5. Results of the E-Voting, General Meetings, Postal Ballot etc.
6. List of Unpaid Dividend to the shareholders.
7. Change in the constitution of the Board of directors, KMP, Compliance Officer, Auditors, Secretarial Auditors, Share Transfer Agent.
8. Agreement with the Share Transfer Agent, Depositories.
9. Any price Sensitive Information's given or provided to the Stock Exchange under Regulation 30 of the SEBI (LODR) Regulations, 2015.
10. Recommendation and payment of dividend to the shareholders.
11. Details of the Complaints received and resolved by the Company.
12. Corporate Governance Report submitted to the Stock Exchange on quarterly and annual basis. (if applicable)
13. Copy of the orders issued by the SEBI or Stock Exchanges relating to securities listed with the Stock Exchanges.

The above said documents shall be hosted by the Company on its website for a period of atleast 8 years. The Board of Directors may decide the preservation period for any particular documents.

AUTHORIZATION FOR MONITORING THE POLICY

The Key Managerial Personnel of the Company authorized by Board of Directors shall be responsible for monitoring the Policy. The authorized person shall inform its Board of Directors about the monitoring of the Policy. The authorized person shall take necessary step to discharge his duty.

PRESERVATION PRINCIPLES

It is only through preservation that continued availability and access to items in the collections can be maintained. The following principles shall be kept in mind:-

- Where possible, documents are preserved in their original format, respecting the physical integrity and authenticity of the original documents.
- Active conservation is employed when appropriate to prevent further deterioration or damage to an item, or to enable access to be given.

- Appropriate conservation measures will take into account the needs, value, significance, and usage of the item in question.
- All staff are made aware of the paramount importance of preservation, and are trained on safe handling of documents

SECURITY OF DOCUMENTS

The Board shall ensure that all the documents shall keep in safe place in the Company premises. The Board may authorize person for the security of documents, who shall be responsible for safe custody of documents.

DISPOSAL OF DOCUMENTS

Disposal of documents after said period of 8 years (whose preservation shall not be permanent in nature) shall be done in the presence of Authorized Person in method prescribed by Board of Directors. Before disposing a soft copy shall be taken for the record.

REVIEW OF THE POLICY

The board of directors of the company shall review the policy on annual basis. The Authorized Person shall provide regular assurance to Board of Directors on the effectiveness of the Policy.

Note: The above said policy was approved by the Board of directors at their meeting held on **4th Day of September, 2017** and shall become applicable from the said date.