



ISO 9001 : 2008 Company

Satra Properties (India) Limited

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ARCHIVAL POLICY

OBJECTIVE:

The Board of Directors of Satra Properties (India) Limited vide its Circular Resolution dated 30th November, 2015, has adopted the following Policy to ensure the preservation and availability of the documents and records of the Company (both in physical and electronic form) after their required regulatory preservation period for any legal, administrative and historical purpose. This Policy is framed as per requirements of Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This Policy will be effective from 1st December, 2015.

PURPOSE:

The purpose of this policy is:

- To capture and store all relevant Documents and Records.
- To ensure security and verified access to all relevant Documents and Records.
- To dispose the Documents or Records in accordance with the authorised retention and disposal schedule.
- To ensure back-up and allow for continuity in the event of a disaster.
- To comply with all regulatory and other legal requirements.

Thus, this Policy aims at ensuring creation and management of authentic, reliable and usable archives for accountability purposes and for preservation of the Company's collective memory.

DEFINITIONS:

1. "Board" means the Board of Directors of the Company;
2. "Company" means Satra Properties (India) Limited;
3. "Designated official" means an officer of the Company entrusted with the responsibility of administering this Policy and implementing reasonable processes and procedures concerning archival of Records or Documents.
4. "Stock Exchange" means:
 - (a) Bombay Stock Exchange; or
 - (b) any such recognized exchange where the securities of the company are listed / traded.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law or shall be understood in their general meaning.

ARCHIVAL METHODOLOGY:

The Company's archival records are classified into the following categories:

- The Records that are eligible to become archives may need to be kept permanently because they constitute evidence or for some other legal reason.
- Documents which do not require permanent preservation but require years of preservation as prescribed under Applicable Law.

The Archives might consist of all the Documents prescribed or maintained as per the Policy for Preservation of Documents of the Company and other Documents which are of relevance to the Company. Archival records are maintained in both the formats viz., physical and Electronic Form.

The documents submitted to the stock exchange to be hosted on the website for the purpose of compliance with disclosure norms shall also be archived. Archiving of the documents to be submitted to the stock exchange, in terms of the regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be done after the lapse of the preservation period of 5 years as per this policy. For the documents to be submitted to the stock exchange to comply with disclosure norms as required by any other applicable law, the documents are to be archived after the lapse of the specified / required time period.

PHYSICAL RECORDS:

Documents and other records are filed appropriately in the corporate filing system as physical files which are under the control of designated officials. The archives are well maintained with restricted access and clear filing systems.

ELECTRONIC RECORDS:

Archival of electronic documents is systematic and the Designated Official is responsible for the operation and maintenance of archives in electronic format.

STATUTORY COMPLIANCE / DISCLOSURE:

The Company will ensure dissemination of all information as required under the Policy for determination of Materiality of Events or information. The Company will ensure displaying of the information on its official website, under the appropriate classification. The Company will also ensure that the disclosures that are made on its website will be available for downloading or viewing for a minimum period of five years. Further, the Company will ensure that all disclosures made by the Company that are required to be communicated to the shareholders are disseminated on its website.

AMENDMENTS:

The Board reserves the right to amend or modify this Policy in whole or in part, at any point of time. In any circumstance where the terms of this policy differ from any existing enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standards will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.