

POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

I. OBJECTIVE

This Policy has been framed by the Company pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015.

The Company is also governed by various acts such as Companies Act 2013, Central Excise and Customs Act, Factories Act, Employees Provident Fund Act, The Income Tax Act, Central Sales Tax Act, various State VAT Acts etc which provide retention period of documents.

The Company has considered the maximum period applicable for retention of documents as per respective statutes as may be applicable to such documents vis-a-vis Regulations.

The objective of this Policy is to establish guidelines for the Company for preservation and archival of documents and orderly disposition of documents of the Company covered under this Policy.

This Policy covers all forms of paper and electronically stored documents.

II. EFFECTIVE DATE

This Policy is effective from December 1, 2015. This Policy is to be complied by respective functional heads of the Company for their respective Departments from time to time. Respective functional departments shall finalize the authorized persons who shall have access to and maintenance of Documents of the Company.

III. DEFINITIONS

“Act” shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“Authorised Person” shall mean an employee of the Company or its subsidiary or associate of the Company, who has been authorised to ensure safe custody, maintain and preserve any Document.

“Board of Directors” or “Board” means the Board of Directors of Blue Star Limited, as constituted from time to time.

“Company” means Blue Star Limited.

“Document” shall mean and include all records of the Company, including those maintained in hard copies or on electronic data processing storage media including emails.

“Listing agreement” shall mean an agreement that is to be entered into between a recognised stock exchange and the Company pursuant to Securities and Exchange Board (Listing Obligations and Disclosure Requirements), 2015

“Policy” means this Policy on preservation of documents as may be amended from time to time.

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

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Listing Agreement, Securities Contracts (Regulation) Act, 1956, Regulations or any other applicable law or regulation.

IV. PRESERVATION PERIOD

Appendix 1 specifies preservation period applicable to the Document(s) of the Company that must be retained for that period. During the Preservation period the Authorised Person shall maintain the document with due care and diligence. Authorised Person shall be subject to disciplinary actions pursuant to the prevailing service rules of the Company, for any gross or willful negligence.

V. DISPOSTION

Any Disposition of Documents(s) that are preserved as per this Policy can only be made after the expiry of its preservation period as mentioned in Annexure-1.

The Documents in respect of which the preservation period has expired shall be disposed after intimation to the Compliance Officer of the Company by the respective functional department. In case of Documents which are required as evidence in any on-going judicial or other proceedings before any court or authority, shall be maintained by the Authorised Person till the conclusive disposal of the said proceedings by the competent court or authority.

Dispositions in relation to electronic records will be handled jointly under the guidance of representative of Information Technology Department and the Authorised Person.

Details of all dispositions made must be laid before the meeting of the Board of Directors of the Company for necessary information.

VI. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

VII. SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy and the Companies Act, 2013/ Securities and Exchange Board (Listing Obligations and Disclosure Requirements), 2015/ Listing Agreement or any other statutory enactments, rules, the provisions of such Companies Act, 2013/ Securities and Exchange Board (Listing Obligations and Disclosure Requirements), 2015/ Listing Agreement or any other statutory enactments, rules as the case may be shall prevail.

VIII. DISSEMINATION OF POLICY

This policy shall be uploaded on the intranet of the Company.

Annexure-1

Sr.	Type of Document	Preservation Period
1	Annual Reports (including Financial Statements)	Permanent
2	Memorandum of Association (including incorporation documents) and Articles of Association	Permanent
3	Notices, Agenda Papers, Attendance Register of Board and its Committee meetings	Eight Years
4	Minutes of Board, Committee, Shareholder and other Meetings	Permanent
5	Books and papers of amalgamated companies pursuant to Section 239 of the Companies Act 2013	Permanent till approval from Central government for disposal.
6	Books and documents relating to issue of share certificates, including blank forms	Permanent
7	Share certificates surrendered to the Company	Three years from the date of such surrender
8	Register of Charges as maintained under the Companies Act 2013	Permanent
9	Documents creating or modifying charge	Eight years from the date of respective satisfaction of charge
10	Register of loans, guarantee and security as maintained under the Companies Act 2013	Permanent
11	Register of contracts or arrangements in which Directors are interested as maintained under the Companies Act 2013	Permanent
12	Register of Renewed and Duplicate Share Certificates as maintained under the Companies Act 2013	Permanent
13	Register of members as maintained under the Companies Act 2013	Permanent
14	Register of Debenture holders or any other security as maintained under the Companies Act 2013	Eight years from the redemption of such security
15	Annual Returns pursuant to section 92 of the Companies Act 2013	Eight years from the date of filing with Ministry of Corporate Affairs
16	Register of Directors, Key Managerial Personnel and its shareholdings	Permanent
17	Company Policies	Eight years from the date of last updation

18	Operational Contracts and Legal Agreements	Eight years after termination and till the disposal of any judicial or other proceedings in which a Document may be a subject matter.
19	Other long term contracts (including real estate and leases)	Permanent
20	Intellectual Property Rights Registrations and related documents	Permanent
21	Insurance Policies	Till the receipt of all the outstanding claims under the policy and till the disposal of any judicial or other proceedings in which policy may be a subject matter
22	Employee contracts and related records	For a period of eight years or till final disposal of any claim made by or against the employee before any competent authority or court whichever is later.
23	Register of Deposits as maintained under the Companies Act 2013	Eight years from the date of last entry in the Register
24	Notices of Disclosure of Interests submitted by Directors to the Company	Eight years from the end of the financial year to which such notices relate.
25	Taxation documents/records (both Direct and Indirect Tax laws)	Eight years
26	Orders and documents issued by judicial authorities where Company is a Party	Permanent
27	Litigation documents where Company is a Party	Permanent
28	Register of Shares or Securities bought back	Permanent
29	Disclosures received pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015	Five years
30	Contents uploaded on the investors section of the corporate website of the Company under the url:www.bluestarindia.com	Ten years