

iStreet Network Limited

Policy on Preservation of the Documents

Regulation 9 of the Securities Exchange Board of India
(Listing Obligations and Disclosure Requirements)
Regulations, 2015 ("Regulations")

1. Scope

A policy on preservation of Documents (defined below) would ensure safe-keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

2. Definitions –

- 2.1 **"Act"** means the Companies Act, 2013.
- 2.2 **"Applicable Law"** means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.
- 2.3 **"Authorised Person"** means any person duly authorised by the Board.
- 2.4 **"Board"** means the Board of directors of the Company or its Committee.
- 2.5 **"Company"** means iSTREET NETWORK LIMITED.
- 2.6 **"Current Document(s)"** means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- 2.7 **"Document(s)"** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

- 2.8 **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- 2.9 **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- 2.10 **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- 2.11 **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- 2.12 **“Regulations”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

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

3. Coverage

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

4. Classification

The preservation of Documents shall be done in the following manner:¹

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is “Current”.
- c) In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance; Provided that generally speaking, a Document may be preserved for a period of 5 years from the date on which the Document was originated.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I

5. Modes of preservation

5.1 The Documents may be preserved in

- 5.1.1 physical form or
- 5.1.2 Electronic Form.

5.2 The officer of the Company required to preserve the Document shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law

5.3 The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

5.4 The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

6. Custody of the Documents

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

7. Authenticity

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

8. Amendment

The Board has authority to amend any clause or replace the whole policy.

9. Interpretation

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard 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.

| Annexure – I | |
|---|---|
| PERMANENT PRESERVATION | TEMPORARY PRESERVATION |
| A. <u>Companies Act, 2013</u> | |
| <ul style="list-style-type: none"> Documents duly stamped in original relating to incorporation and matters incidental thereto, changes in any clause of Memorandum and Articles of Association. Register of members Books and Documents relating to the issue of share certificates, including the blank forms of share certificates Register of renewed and duplicate share certificate The foreign register of members Register of charges Minutes book of general, board and committee meetings. Particulars of Loan, Investment and guarantee by a Company Investment made by Company not held in its own name Contracts or arrangements in which directors are interested | <ul style="list-style-type: none"> Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities) Annual returns (8 years from date of filing with the Registrar) Foreign register of debenture holders or any other security holders (8 years from the date of Redemption) All notices pertaining to disclosure of interest of directors – 8 years All certificates surrendered to a company (3 years from date of surrender) Register of deposits – 8 years Register for sweat equity shares – 8 years Register for ESOP – 8 years Register of securities bought back – 8 years Proxies and Proxy register – 8 years Books of accounts – 8 years Dividend register and records Instrument creating a charge or modification (8 years from date of satisfaction of charge) Attendance registers – 8 years Records of postal ballot – 8 years Forms filed with ROC – 8 years Annual Reports- 8 years Borrowing related documents – 8 years |
| B. <u>Secretarial Standard</u> | |
| Minutes of Board meeting (SS-1) | Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2) |
| | Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 10 years or as long as they remain current. |

C. Disclosures made/received under SEBI Regulations shall be preserved as under :

| Sr No. | Regulations | Name of the Documents/Records | Preservation Period |
|---------------|---|--|--|
| 1 | Regulation 6 of SEBI (Prohibition of Insider Trading Regulations, 2015) | Disclosures made under this regulation | Five years |
| 2 | Regulation 30 under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 | All events/informations which has been disclosed to stock exchange(s) | Disclosures of such events/informations shall be hosted on the website for Five years and thereafter as per the archival policy of the Company |
| 3 | Regulation 40(3) under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 | Proper verifiable dated records of all correspondence with the investor shall be maintained by the Company | Five years |
| 4 | Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2015 | Disclosures made under this Regulations | Five years |

D. Preservation of Corporate Policies :

The Company shall preserve permanently various policies framed under Companies Act, 2013 and SEBI regulations from time to time viz.:

1. Code of Conduct for Board of Directors and Senior Management
2. Policy for determining Material Subsidiary
3. Related Party Transaction Policy
4. Risk Management Policy
5. Remuneration Policy
6. Whistle blower Policy
7. Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders
8. Code of practices and procedures for fair disclosure of unpublished price sensitive information
9. Policy of Materiality of Events
10. Policy of preservation of Documents
11. Sexual Harassment Policy
12. Archival policy

Approved by Board of Directors on 10th December 2015