

# STEAMHOUSE INDIA LIMITED

(FORMERLY KNOWN AS ANKLESHWAR ECO ENERGY LIMITED)

REG. OFFICE: PLOT NO.8108/1, ROAD NO. 2, G.I.D.C., SACHIN, SURAT - 394230

CIN: U40300GJ2015PLC083493

CONTACT NO.: +91 9099512222

Email Id: [compliance@steamhouse.in](mailto:compliance@steamhouse.in)

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## POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS IN THE WEBSITE

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*[Under Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

The Board of Directors (the “Board”) of **STEAMHOUSE INDIA LIMITED** (the “Company”) has adopted the following policy with regard to preservation of Documents. This Policy has been formulated in accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. This Policy shall be known as “Policy on Preservation of Documents and Archival of Documents in the Website”.

### **OBJECTIVE**

The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under the Regulation 9 of the Listing Regulations, 2015.

### **EFFECTIVE DATE:**

The Policy shall come into force with effect from the date Regulation 9 of the SEBI Listing Regulations takes effect with respect to the Company.

### **DEFINITION**

- I. “**Board of Directors**” or “**Board**” shall mean the Board of Directors of **STEAMHOUSE INDIA LIMITED** as constituted from time to time.
- II. “**Company**” shall mean **STEAMHOUSE INDIA LIMITED**.
- III. “**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc. and the like as are required to be maintained under any law or regulation for the time being in force.
- IV. “**Act**” shall mean the Companies Act, 2013.
- V. “**Listing Regulations**” shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

### **TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION**

The Company shall maintain and preserve documents as specified hereunder:

**Category (A):** The documents of permanent nature (listed in **Annexure 1** shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion, or any changes made therein from time to time Provided that all such modifications, amendments, additions or deletion in the documents shall also be preserved permanently by the Company.

**Category (B):** The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in **Annexure 2** shall be preserved by the company for a term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term **not less than eight years**

For the purpose of this policy, documents may include the following:

- I. ‘books and papers’ as defined in clause 12 of section 2 of the Act;

*Adopted in Board Meeting dated 14/11/2022*

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- II. 'Books of accounts as defined in clause 13 of section 2 of the Act;
  - III. 'Documents' as defined in clause 36 of section 2 of the Act;
  - IV. 'Registers' as defined in clause 74 of section 2 of the Act

Further, the company may be deeming fit and possible from time to time, maintain above mentioned documents in electronic form to the extent possible.

## **MODES OF PRESERVATION OF THE DOCUMENTS**

- I. The documents may be preserved in physical form or electronic form
- II. The officer of the Company required to preserve the documents shall be Authorized Person who is generally expected to observe the compliance of requirements of Applicable Law.
- III. 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
- IV. The preserved documents must be accessible at all reasonable times. Access may be controlled by Authorized person, so as to ensure integrity of the Documents and prohibit unauthorized access.
- V. Physical preservations shall be ensured in proper store / record rooms, access to which shall be allowed to only persons authorized

## **DISPOSAL/DESTRUCTION OF DOCUMENTS**

The temporary documents as listed in Category (B), excluding the current Documents shall be destroyed after the relevant or the prescribed period, by the Authorized Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under Applicable Laws pursuant to which the Documents have been preserved.

## **STATUTORY REQUIREMENTS**

If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

## **ROLES AND RESPONSIBILITY**

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy which shall be reported annually to the Audit Committee for its review.

## **AMENDMENT**

Any change in the policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/or amend any part of this policy or the entire policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

## **WEB ARCHIVAL POLICY**

- I. The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s).
- II. Such disclosures shall be retained on the website of the Company for a minimum period of five years.
- III. At the end of the fifth year the information shall be archived and preserved for a further period of three years.

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***Indicative List***

## **Annexure 1**

### **DOCUMENTS FOR PERMANENT PRESERVATION**

- ❖ Registration Certificate
- ❖ Memorandum & Articles of Association
- ❖ Licenses & Statutory Approvals
- ❖ Property records including purchase and sale deeds, licenses, copyrights, patents & trademarks
- ❖ Statutory Registers required under applicable laws
- ❖ Accounting and Finance records including Annual Financial statements and Audit Reports, Investments Records,
- ❖ Minutes of General Meetings
- ❖ Minutes of Board Meetings
- ❖ Minutes of various Committee Meetings
- ❖ Material Agreements/ Contracts
- ❖ Orders issued by Courts/ Statutory Bodies
- ❖ Any other documents as may be required to be maintained permanently in terms of applicable law(s), and as maintained and preserved from time to time.

## **Annexure 2**

### **DOCUMENTS FOR PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS**

- ❖ Books of Accounts, Vouchers, bank Statements
- ❖ Annual Returns
- ❖ Filings with Stock Exchanges, Registrar of Companies and other statutory authorities
- ❖ Personnel Documents
- ❖ Attendance Registers, Agenda papers, Notice of Board Meeting, Committee Meeting, General meeting and other related Papers.
- ❖ Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retiral related Records, etc.
- ❖ Insurance Policies/ Claims under various policies
- ❖ Correspondence with Departments/ Shareholders
- ❖ Non-Statutory Registers/ Documents
- ❖ All notices pertaining to disclosure of interest of Directors
- ❖ Any other document as may be required to be maintained in terms of applicable law(s), maintained, and preserved from time to time.