



ARCHIVAL POLICY

The Archival Policy has been developed in order to compliance with the requirements of the SEBI (Listing Obligations and Disclosure requirements) Regulations, 2015. Purpose is to recognize information and documents those are valuable to the Company and their preservation period.

Requirements:

- (1) The Company is maintaining a functional web site containing basis information about the Company and the web site is updated from time to time.
- (2) Information/documents published/displayed in the web site are properties of the Company.
- (3) The Company shall inter alia disseminate following information on its website :
 - a. Details of its business;
 - aa. Memorandum of Association and Articles of Association;
 - ab. Brief profile of board of directors including directorship and full time positions in body corporates,
 - b. Terms and conditions of appointment of Independent Directors
 - c. Various Committees formed by the Company;
 - d. Code of Conduct of Board of Directors and Senior Management personnel;
 - e. Whistle Blower Policy;
 - f. Remuneration Policy;
 - g. Related Party Transaction Policy
 - h. CSR Policy;
 - i. Policy for determining 'material subsidiary';
 - j. Email address for grievances redressal and other relevant details
 - k. Policy on Preservation of documents;
 - l. Archival Policy;
 - m. Board familiarization policy;
 - n. Policy on determination of materiality of events/information;
 - o. Contact details of designated officials for grievance redressal;
 - p. Details of Registrars and Share Transfer Agent;
 - q. Prevention of Insider Trading policy;

- r. New name and the old name of the Company (if any) for a continuous period of one year, from the date of last name change;
- s. Quarterly shareholding pattern;
- t. Notice of meeting of the Board of Directors where financial results shall be discussed;
- u. Financial results on conclusion of the meeting of the Board of Directors where financial results were approved;
- v. Complete copy of Annual Reports including balance sheet, profit and loss account, directors' report, corporate governance report etc., will be available for a period of 5 years. Thereafter the information will be stored for an additional period of 3 years. Consequent to completion of additional period, the information will be removed from the web site at the discretion of the management ;
- w. Shareholding pattern and Annual Reports will be kept for 5 years thereafter will be stored for an additional period of 3 years. Consequent to completion of such additional period the information will be removed from the web site at the discretion of the management.
- x. Items as per Regulation 47(1)
- y. Credit Rating and any revision in credit rating of the Company
- z. Separate Audited Financial statements of each of the subsidiary company of relevant financial year uploaded at least 21 days prior to the date of AGM
- aa. Secretarial Compliance Report
- bb. Contact details of KMP authorized for determining materiality of an event
- cc. Disclosures under sub regulation 30(8)
- dd. Dividend distribution policy
- ee. Annual Return
- ff. Employee Benefit Scheme Documents
- gg. Statement of deviation or variation
- hh. i) Schedule of Analyst or Institutional investors meet.
 - ii) Investors Presentation prepared by the Company
 - iii) Audio Recordings or video recordings
 - iv) Transcripts of such investor meet
- ii. Details of agreements entered into with the media companies and/or their associates etc.,

In accordance with the provisions of the Listing Regulations the Company shall ensure all the information as stated above shall be hosted on the Company's website (www.starcement.co.in) for a period of 5 (five) years and thereafter and thereafter the information shall be stored for an additional period of 3 years. Consequent to completion of such additional period, the information will be removed from the web site at the discretion of the management.

(4) Other obligations of the Company :

- (i) The Company will ensure that contents of the web site are correct.
- (ii) The Company shall update the web site within 2 (two) working days of such change.

- (iii) Archival material should not be destroyed without approval of the authorized person.
- (iv) Nothing contained herein shall be deemed to lead to an exception in case of an accidental deletion, or deletion due to any system flaw, virus, and technical issue or any other deletion, inaccessibility or loss due to any reason other than deliberate and determinate deletion.
- (v) The management is responsible for deciding how long archival material is to be retained, if the concerned law does not specify any time frame, the retention period shall be 3 years or such time as the management may determine.
- (vi) In case of any subsequent changes in the provisions of Listing Regulations or any other applicable law which make the provisions in the Policy inconsistent with the Listing Regulations or any other applicable law, the provisions of the Listing Regulations and such law shall prevail over the Policy and the provisions in the Policy shall be modified in due course to make it consistent with the law.
- (vii) Management is authorized to change the policy as and when required.
- (viii) The Policy is reviewed, amended and approved by the Board of Directors of the Company on May, 2025 and is effective from same date.