



GOEL

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

OF

SHRI BAJRANG ALLOYS LIMITED

1. Preamble

This Policy on Preservation of Documents and Archival (“Policy”) is prepared and adopted to effectively manage the records of Shri Bajrang Alloys Limited (“SBAL” or “Company”) and is obliged to create, maintain, preserve and dispose of such records in accordance with the requirement of Regulation 9 of the SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015 read with the relevant provisions of the Companies Act, 2013 and rules made there under; as amended from time to time. This policy shall classify the records of the company based on their reference value and legal requirements.

2. Purpose Of The Policy

The purpose of this policy is to establish the framework needed for effective management of the Record and set principles for Company’s approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of Record is required. A good document preservation program is fundamental to the Company’s commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents. This policy seeks to ensure that the Company’s business is adequately documented which are managed in accordance with best practice. Preservation of Record is the responsibility of all staff at all level in respective Department & users of archives of the Company to ensure their continuous and timely availability.

3. Applicable Defination

3.1 “Act” means Companies Act, 2013;

3.2 “Board” means the Board of Directors of the Company;

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

3.4 “Records” in relation to this policy includes accounting records, “book and paper” as defined in section 2 (12) and “books of account” as defined in section 2 (13) of the Companies Act, 2013 including statutory, Legal and other documents of material significance maintained on paper or in electronic form.

Any other term not defined herein shall have the same meaning as prescribed under the Companies Act, 2013, Listing Regulations or any other relevant regulation/legislation applicable to the Company.

4.1. Coverage

This Policy is intended to guide the Company and its officers and employees on maintenance of all Records, their preservation and disposal.

4.2. Preservation of Record

The preservation of Record 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. This policy sets the standards for managing, storing and preservation of records of the Company broadly classified in the following two categories

- a) Documents whose preservation shall be permanent in nature(**listed in Annexure 1**);
- b) Documents with preservation period of not less than eight (8) years after completion of the relevant transactions (**listed in Annexure-2**).

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation, for the time being in force.

4.3. Classification of Records

To ensure the ease in maintenance of records and effective utilization of space, the company may preserve the documents/ Records in following manner :-

- a) Digital documents can be maintained in forms such as e-mails, web pages or database records, plus scanned versions of papers that have been digitized in business processes.
- b) Physical documents to be maintained in books and files.

All digital and physical records shall be saved/ maintained at the registered office of the Company or such other place in compliance with section 128 of the Act.

4.4. Roles & Responsibilities

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy. They must handle the documents sensibly and with care and preserve them to avoid any damage.

4.5. Authority to approve the policy

The Board of directors of the company shall have the authority for approval and adoption of any amendments in this policy in pursuance to the Listing Regulations or/ and the Act, wherever applicable.

4.6. Destruction Of Documents

- a) All documents mentioned in **Annexure-1** need to be permanently preserved by the Company during its entire life time. Utmost care is to be taken to ensure that files are well preserved.
- b) All documents mentioned in **Annexure-2** which are temporary in nature must be preserved for a period not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records may be destroyed in such mode under any instructions approved by the department head(s).
- c)

4.7. Web Archival Policy

- a) The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s).
- b) The disclosures made pursuant to Regulation 30 of Listing Regulations shall be retained on the website of the Company for a minimum period of five years.
- c) At the end of the fifth year the information shall be archived and preserved for a further period of three years.

4.8. General

Notwithstanding anything contained in this Policy, the Company shall ensure to comply with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

4.9. Amendment

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

Annexure 1

Documents whose preservation shall be permanent in nature

S. No.	Nature of Document(s)
01	Registration Certificates obtained from various statutory authorities.
02	Licenses & Statutory Approvals.
03	Statutory Registers required under applicable laws except Register of Charge & Register of Deposit
04	Minutes of General Meetings, Board meetings and various Committee Meetings.
05	Memorandum and Articles of Association as amended from time to time.
06	Material Agreements/Contracts
07	Orders issued by Courts/Statutory bodies.
08	Investment Documents/proofs including certificates etc.
09	Records relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10	Policies of the Company framed under various regulations.
11	Documents related to Development/Intellectual Property and Trade Secrets.
12	Any other document as may be required to maintain permanently in terms of applicable law(s)

Annexure 2

Documents with preservation period of not less than eight years after completion of the relevant transactions

S.No	Nature of Document(s)
01	Voucher(s) register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013.
02	Annual Return(s) as per Companies Act, 2013.
03	Forms and returns filed with RBI/MCA or with any other statutory authority.
04	Register of Charge & Register of Deposit as per Companies Act, 2013
05	Annual financial statements including: <ul style="list-style-type: none">• Annual accounts• Directors report• Auditors report
06	Notice, scrutinizer's report, Proxy forms, Representation letters, Poll receipts and other Documents related to General Meeting.
07	Notice, Agenda, Circular resolutions and other Records related to Board & Committee Meeting.
08	Compliance Reports received from any statutory authority.
09	Copy of newspaper advertisements or publications.
10	All Records under the Listing Regulations.
11	Income Tax Returns filed under Income Tax Act, 1961.
12	Employment and personnel records.
13	Correspondences with Departments/shareholders.
14	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
15	Any other document as may be required to maintain in terms of applicable law(s)