

POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations” or “Regulations”] requires every listed company to have a policy on Preservation of Documents / Records maintained by the Company in Electronic Mode or other mode as prescribed under the Statute.

2. SCOPE

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVES OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The major objectives of the policy are:

- Identification of statutory registers and other records of the Company which are required to be preserved.
- Identification and categorization of the statutory registers and other records to be maintained either for eight years or permanently.
- Decide whether the statutory records and documents are to be preserved in electronic form or any other form.
- After completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

4. DEFINITIONS

- a) “Act” means the Companies Act, 2013, Rules framed thereunder and any thereto;
- b) “Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

- c) "Company", "This Company", "The Company", "Company" wherever occur in the policy shall mean "Shah Alloys Limited".
- d) "Current" means running matter or whatever is at present in course of passage.
- e) "Board of Director" or "Board", means the collective body of the Directors of the company;
- f) "Policy" or "This Policy" means, "Policy on Preservation of Documents."
- g) "Maintenance" means keeping Documents, either physically or in Electronic Form.
- h) "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- i) "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.

5. INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. GUIDELINES

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows

- A. documents whose preservation shall be permanent in nature;
- B. documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a) documents that needs to be preserved and retained permanently;
- b) documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulations;
- c) documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.
- d) where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

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

7. MODES OF PRESERVATION

The Documents may be preserved in:

- 1) Physical or
- 2) Electronic

The official of the Company required to preserve the document shall be Authorized Person who is generally expected to observe the compliance of statutory requirements as per applicable law. 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.

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

8. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

ANNEXURE – A

Indicative list

A) DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

- a) Accounting and Finance records including Annual Financial statements and Audit Reports;
- b) Investment records;
- c) Tax records including annual returns;
- d) Property records including purchase and sale deeds, licenses, copyrights, patents & trademarks;
- e) Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Registers & Records;
- f) Personal files of individual employees (Payroll Records, Employee deduction authorizations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc);
- g) Any other record as may be decided by any KMP (as per Companies Act 2013) or the Managing Director or the Board of Directors of the Company from time to time;
- h) Filings with Registrar of Companies.

B) DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:

- a) Bank Statements and vouchers;
- b) Filings with Stock Exchanges and other statutory authorities;
- c) Corporate Social Responsibility Records;
- d) Sponsorship Projects Records;
- e) Correspondence and Internal Memoranda;
- f) Security Deposit Receipts (after receipt of deposit money back);
- g) Tender Documents;
- h) Lease Deeds and Contracts;
- i) Legal files; Insurance Records including policies and claims;
- j) Office copies of Notice of General Meeting and related papers
- k) Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers

l) All notices pertaining to disclosure of interest of directors

m) Any other record as may be decided by the Managing Director of the Company from time to time.

C) OTHERS:

As per applicable law
