

**POLICY ON PRESERVATION OF DOCUMENTS
&
ARCHIVAL POLICY**

➤ **PREAMBLE:**

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**“Listing Regulations”**), the Company is required to formulate a policy on Preservation of Documents which is required to be maintained under Listing Regulation.

In terms of Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**“Listing Regulations”**), the Company is required to formulate an Archival Policy for disclosure of all material events/information of the Company specified in Schedule III of the Listing Regulation.

➤ **SCOPE:**

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

➤ **DEFINITIONS:**

1. **“Act”** means the Companies Act, 2013 and rules made thereunder, as amended from time to time.
2. **“Board of Directors”** or **“Board”** shall mean the Board of Director of Indian Bright Steel Co Limited, as constituted from time to time.
3. **“Company”** means Indian Bright Steel Co Limited.
4. **“Documents”** means all papers, records, orders, declarations, files, books, forms and registers, etc., and the like as required to be maintained under any law or regulation for the time being in force.
5. **“Electronic Form”** with reference to information means any information generated, sent, received or stored in media, magnetic, optional, computer memory, micro film, computer generated micro fiche or similar devices.
6. **“Listing Regulations”** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments made thereto.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

➤ **OBJECTIVE:**

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

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

Provided further that the Company may keep the documents as specified above in electronic mode.

➤ **RESPONSIBILITY:**

The concerned departmental head will be responsible for the maintenance, preservation and destruction of records pertaining to the respective department.

➤ **PROVISIONS WITH REGARD TO PRESERVATION AND RETENTION OF DOCUMENTS:**

The Company from time to time establishes retention or destruction of policies or documents or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property rights. While minimum retention periods are suggested, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

- A.** The documents of a permanent nature (listed in **Annexure A**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, additions, deletions in the documents shall also be preserved permanently by the Company.

- B.** The document to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure B**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modification, amendments, additions, deletions 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 term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

➤ **MODE OF PRESERVATION:**

Records/documents may be preserved either physically or in electronic form.

➤ **DESTRUCTION OF DOCUMENTS:**

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

➤ **COMMUNICATION OF THE POLICY:**

The Policy will be disclosed on the website of the Company.

➤ **AMENDMENTS TO THE POLICY:**

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 A

Documents whose preservation shall be permanent in nature

Sr. No.	Nature of Document(s)
1.	Certificate of Incorporation
2.	Memorandum and Articles of Association of the Company
3.	Licenses & Statutory Approvals
4.	Statutory Registers required under applicable laws
5.	Audited financial statements
6.	Minutes of General Meetings
7.	Minutes of Board Meetings
8.	Minutes of various Committee Meetings
9.	Material Agreements/Contracts
10.	Orders issued by Courts/Statutory bodies
11.	Investment Documents/proofs including certificates etc.
12.	Any other document as may required o maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure B

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

Sr. No.	Nature of Document(s)
1.	Books of Accounts
2.	Annual Return
3.	Personnel Documents
4.	Insurance Policies/ Claims under various policies
5.	Correspondence with Departments/ shareholders
6.	Non-Statutory Registers/ Documents
7.	Films, Videos, CDs, DVDs, tapes etc.
8.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

xxxxxx