

STEELCAST LIMITED
POLICY FOR PRESERVATION OF DOCUMENTS
(As decided by the Board of Directors on 28.01.2016)

1. Preface: The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Listing Regulations come into force from December 1, 2015. The Listing Regulations mandate listed entities to formulate a Policy for preservation and archiving of documents. It is in this context that the policy for preservation of documents (“Policy”) is being framed and implemented.

2. Purpose: The objective of this Policy is to classify the documents into two categories, namely

- a. Temporary Documents:** These are documents which need to be preserved for a specific period of time.
- b. Retained Documents:** These are documents which need to be preserved permanently.

2.2 Temporary Records: Temporary records include all business documents that are intended to be superseded by final or permanent records, or which are intended to be used only for a limited period of time, including, but not limited to written memoranda and dictation to be typed in the future, reminders, to-do lists, reports, drafts, and inter-office and inter-office correspondence regarding a client or business transaction.

2.1 Retained Records: Retained records include all business documents that are not superseded by modification or addition, including but not limited to documents given (or sent via electronic form) to any third party not employed by the Company, or to any government agency; final memoranda and reports; correspondence; handwritten or voice memoranda not further transcribed; minutes; specifications; journal entries; cost estimates; etc.

2.3 Record Retention Schedule: Each Head of the Department shall identify and at all times maintain a schedule of Temporary and Retained documents as per Annexure- A.

3. Administration: Attached as Appendix A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode too.

3.1 The Key Managerial Personnel, Presidents, Heads of the Department who are responsible for relevant areas of the Company’s operations (“Responsible Officers”) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed.

3.2 The Documents Preservation Schedule may be modified / supplemented from time to time to ensure that it is in compliance with local, State and Central Laws and prudent practices and monitor compliance with this Policy.

3.3 The Board shall also 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.

3.4 In the event of any contradiction in the Documents Preservation Schedule and the statutory provisions, the period provided for in the statutory provisions shall prevail.

4. Adherence to the Policy by the employees: The Company expects from its Responsible Officers to understand and fully comply with this Policy and schedules, provided however that if it is believed, or the Company informs otherwise, that Company records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then the same be preserved until the Responsible Officers determine the records are no longer needed. That exception supersedes any previously or subsequently established destruction schedule for those records. If any employee believes that exception may apply, or has any question regarding the possible applicability of that exception, he/she may contact the Responsible Officers.

4.1 Further, in the event the Company is served with any legal or statutory notice for any Document(s) from any of the statutory authorities or any litigation / proceeding is commenced by or against the Company, then the disposal of documents which are subject matter of such notice or litigation, etc. shall be suspended till such time, as the matter is settled or resolved or disposed of. The Responsible Officers / Legal Department shall immediately inform relevant employees of the Company for suspension of further disposal of Documents. This Policy shall be posted on the website of the Company.

5. Procedure for disposal of Documents: The Documents that are no longer required as per the time schedule prescribed in the Annexure- A may be destroyed. The Responsible Officers may direct the relevant employees from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Annexure- A. The details of the Documents destroyed by the Company shall be recorded in the **Register for Disposed Records** to be kept by employees who are disposing the Documents in the format prescribed at Annexure- B.

Acknowledgment: We gratefully acknowledge that in preparing this policy assistance has been derived from the policies for preservation of documents of M/s. TATA Steel Ltd and Suzlon Energy Ltd.

ANNEXURE- A

A. Documents Preservation Schedule for Corporate Record:

Sr. No.	Document Type	Preservation Period (in Yrs.)
1.	Common Seal, Certificate of incorporation, Certificate of change of name (if any), Memorandum and Articles of Association as amended from time to time, Counter folios of Share Certificates issued from time to time	Permanent
2	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3	Statutory Registers	Permanent
4	License and Permissions	Permanent
5	Statutory Forms except for routine compliance	Permanent
6	Scrutinizers Reports	Permanent
7	Register of Members	Permanent
8	Index of Members	Permanent
9	Orders issued by Courts/Statutory bodies	Permanent
10	Investment Documents/proofs including certificates etc.	Permanent
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.	Permanent
12	Books of Accounts	
13	Annual Returns	8
14	Board Agenda and supporting documents	8
15	Attendance Register	8
16	Office copies of Notice of General Meeting and related papers	8
17	Personnel Documents	
18	Insurance Policies/ Claims under various policies	
19	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8
20	Register of Debenture-holders (if require)	15 years after the redemption of debentures
21	Index of debenture-holders (if require)	15 years after the redemption of debentures
22	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.	As per requirement

B. Documents that are to be made available on the Company's website: In Compliance with the SEBI (Listing Regulations and Disclosure Obligations), 2015 will be made available on the website for a period of 5 years and thereafter will be archived for a period of further 3 years.

C. All other documents: All other documents of the Company shall be maintained in compliance with the requirements of the applicable laws.

ANNEXURE- B

RECORD OF DOCUMENTS DESTROYED

Sr. No	Particulars of documents destroyed	Date and mode of destruction with the initials of the Responsible Officer