

## **POLICY ON PRESERVATION OF DOCUMENTS**

### **1. INTRODUCTION:-**

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), the Board of Directors (the “Board”) of Steel Strips Limited has adopted this Policy at its meeting held on November 14, 2015 ,for Preservation of Documents, as required under applicable regulations. This Policy is effective from December 01, 2015

In any circumstance, where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

### **2. DEFINITIONS:-**

A. “Board of Directors” or “Board”

Board of Directors or Board shall mean the Board of Directors of Steel Strips Limited, as constituted from time to time.

B. “Company”

Company shall mean “Steel Strips Limited”

C. “Documents”

Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic Storage devices etc., and the like as required to be maintained under any law or Regulation for the time being in force.

D. “Listing Regulations”

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

### **3. OBJECTIVE:-**

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

A. The documents of a permanent nature (listed in Annexure1) 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, deletions in the documents shall also be preserved permanently by the Company.

B. The documents to be maintained and preserved for the time period as specified under applicable regulations (specified time) after Completion of the relevant transactions (listed in Annexure 2) shall be preserved by the Company for the term not less than the specified period after completion of the relevant transactions subject to the modifications, 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 a term not less than the specified period.

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

#### 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.

#### 5. Authority for approval of Policy:-

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via these Regulations.

#### 6. Destruction of Documents:-

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the 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

A register of the Documents disposed/ destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/ destruction and the mode of destruction.

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#### Annexure 1

##### Documents whose preservation shall be permanent in nature

S.NO	Name of Documents
1.	Memorandum & Articles of Association
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited Financial Statements
5.	Minutes of Board Meeting
6.	Minutes of General Meeting
7.	Minutes of Various Committee Meetings
8.	Material Agreement/ Contracts
9.	Orders issued by Court/Statutory Bodies
10.	Investment Documents/ Proofs including Certificates etc.
11.	Any Other document as may be required to be maintained permanently in terms of applicable law(s)

#### Annexure 2

##### Documents with preservation period of not less 8 Years after Completion of the relevant Transactions

S.NO	Name of Documents
1.	Books of Accounts
2.	Annual Return(s) under the Companies Act, 2013
3.	Insurance policies/ Claims under various policies
4.	Correspondences with Departments/ Shareholders
5.	Non Statutory Documents/ Registers etc
6.	Any Other document as may be required to be maintained in terms of applicable law(s)