



***POLICY ON PRESERVATION
OF DOCUMENTS AND ARCHIVAL POLICY***

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A. BACKGROUND:

Pursuant to the Regulations 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as defined below), the Company is required to frame a “Policy for Preservation of Documents and Archival Policy”.

In this context, the Board of Directors has approved the “Policy for Preservation of Documents and Archival Policy (as defined below) at its meeting held on 14.02.2023 with the objective of classifying the various information and documents filed with the stock exchange(s), record and register for the purpose of maintenance and preservation of such information and documents filed with the stock exchanges, identification of custodian to retain and preserve such records/ information/ documents along with the mode in which such records/ information/ documents will be maintained.

The Policy shall be applicable for preservation of documents/ records maintained by the management/ employees of the Company as per the respective statutory/ non-statutory requirements either in (i) Physical mode; or(ii) Electronic Mode.

B. OBJECTIVE OF THE POLICY:

The objective of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved for the time limit as per the statutory requirements and to ensure that the records of the Company which are no longer needed or which are not required to be maintained as per the statutory requirements or are of no value are discarded in proper manner, so that no one can have access to such discarded documents, after following the due process for discarding the documents.

This Policy also outline the framework for all the employees and top management to understand the roles and responsibilities towards retaining and preserving the documents and records. This Policy shall also outline the custodian of the documents and records and detail process to get the access of such documents.

C. SCOPE OF THE POLICY:

This Policy shall become applicable to all the departments of the Company by virtue of the approval by the Board of Directors of the Company. Each and every department of the Company, are required to maintain certain information, documents, registers and records either as per various statutory requirement in physical mode or in electronic mode. This Policy will ensure that the Company maintains the both electronic and physical documents as per various statutory requirements and shall be preserved with same degree of confidentiality and care.

D. DEFINITION:

- i. **“Act”** means the Companies Act, 2013 and rules framed thereunder (including any statutory modification or amendment thereof);
- ii. **“Board”** means the Board of Directors of Aanchal Ispat Limited;
- iii. **“Company”** means Aanchal Ispat Limited incorporated as per Companies Act,2013;
- iv. **“Documents”** means all the business records liker registers, records, papers, agreements, notices, advertisements, requisitions, order, declarations, forms, show cause notice, minutes, replies, or any other records and registers to be maintained as per the statutory requirement or in order to comply with the requirements of any applicable law, whether required to be submitted to concerned authority or sent to government department or any associates, or otherwise, and records maintained in the electronic form received or kept pursuant to the Companies Act, 2013, or under any other applicable laws for time being in force or otherwise, maintained in physical or in electronic form.
- v. **“Listing Regulations” or “LODR Regulations”** means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- vi. **“Stock Exchange(s)”** means the stock exchange where the securities of the Company is listed.
- vii. **“Maintenance”** means keeping documents, either physically or in Electronic form.
- viii. **“Preservation”** means to keep the documents under the custody of authorised person, which shall prevent the documents from being altered, damaged or destroyed.
- ix. **“Policy”** means this Policy for Preservation of Documents and Archival Policy

Any other term which are not defined herein shall have the same meaning as defined in the SEBI (LODR) Regulations, 2015, Companies Act, 2013, or any other applicable laws or regulations.

E. MAINTENANCE OF RECORDS:

- i. The content and essential characteristics of digital records must remain unchanged through preservation.
- ii. Digital records can be maintained in forms such as emails, web pages or database records, plus scanned versions of paper records that have been digitized in business processes.
- iii. Physical records to be maintained in books and files and shall be duly numbered along with month and year clearly marked therein on the books and files.
- iv. All digital and physical records to be saved at the registered/administrative office of the Company and no physical records can be migrated without permission of Company Secretary/Directors/Authorized persons.
- v. A record of all physical records migrated from the registered office/administrative office of the company shall be duly entered into a register/electronic record along with the signatures of the person to whom the documents had been handed over and the Company Secretary / Directors / Authorized persons.
- vi. A reproduction of any original record on microfilm or on any other medium shall be certified by a Director or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.

F. DISPOSAL AND DESTRUCTION OF RECORDS:

- i. All records mentioned in **Annexure A** which are temporary in nature must be preserved for 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 can be destroyed.
- ii. All records mentioned in **Annexure B** need to be preserved by the Company permanently during the entire life of the Company.
- iii. Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.
- iv. The Company shall maintain a register as specified in **Annexure C**, wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.

G. ARCHIVAL POLICY:

Regulation 30(8) of the Listing Regulations requires the listed companies to disclose on its website all such events or information which has been disclosed to stock exchange(s) pursuant to the various provisions of the Listing Regulations, and such disclosures shall be hosted on the website of the Company for a period of minimum 5 (five) years and thereafter as per the Policy of the Company, as disclosed on its website. The purpose of the Policy is to disseminate equal, adequate and timely information to the shareholders through the website of the Company and to enable them to track the performance/ events of the Company over regular intervals of time and provide sufficient information to enable investors to access the current status of the Company.

H. REVIEW:

This Policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to necessary approval of the Board of Directors.

ANNEXURE – A: DOCUMENTS TO BE PRESERVED FOR EIGHT YEARS

Item No	Records / Documents
1	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2	Annual Returns as per Companies Act, 2013
3	Register of Deposits as per Companies Act, 2013
4	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
5	Annual financial statements including Annual accounts, Directors report, -Auditors report
6	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
7	Income Tax Returns filed under Income Tax Act, 1961
8	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
9	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
10	Copy of newspaper advertisement or publications
11	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases
12	Compliance Reports received from any statutory authority
13	Correspondences made with any statutory authority
14	Register of Power of attorneys, if any
15	Forms and returns filed with RBI/MCA or with any other statutory authority

ANNEXURE – B: DOCUMENTS TO BE PRESERVED PERMANENTLY

Following are the list of documents which shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time:

Item No.	Records/ Documents
1	Certificate of incorporation
2	Certificate for commencement of business
3	Memorandum and Articles of Association (along with the amended copies)
4	Agreements made by the Company with Stock Exchanges, Depositories, etc.
5	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013 and Secretarial Standards
6	All the registers and records as per Companies Act and LODR Regulations
7	Such other records as may be required under any law from time to time
8	Intellectual Property Documents shall include but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs, Intellectual Property rights documents that are owned by the Company shall be retained by the Company permanently
9	All the documents like agreements, application, stamp duty payment receipts for all the properties that are owned in the name of the Company

ANNEXURE – C: LOG BOOK (REGISTER OF DOCUMENTS DISPOSED OFF)

Date	Mode of Destruction	Particular of Documents	Custodian of documents	Signature of authorised person
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