

CHANDI STEEL INDUSTRIES LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

BACKGROUND

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (Hereinafter called as “The Regulations”) every listed Company shall frame a policy on preservation of documents. This policy inter alia provides for preservation of documents where such preservation shall be of permanent nature as also documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

The objective of this Policy is to ensure that the documents / records required to be prepared and disclosed to the stock exchanges pursuant to the Listing Regulations (“the Listing Records”), whether physically or in electronic form be preserved for a minimum period of 8 years from the date of completion of relevant transaction. Further, if any other applicable law requires the preservation of any of these Listing Records for a longer period or permanently, then those shall be preserved / maintained accordingly. This policy is framed as per requirement of Regulation 30 (8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

Considering the above requirement of the Listing Regulation, M/s. Chandi Steel Industries Limited, hereinafter referred to as “Company” formulates the policy on Preservation of Documents in pursuance of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015.

DEFINITIONS

1. “Board”

Board means “Securities and Exchange Board of India.”

2. “Company”

Company means “Chandi Steel Industries Limited”

3. “Listing Regulations”

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

4. “Documents”

Documents means all papers, records, files, books etc., and the like as required to be maintained under Listing Regulations.

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5. Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

GOVERNING LAWS

This policy shall be governed by the Companies Act 2013, SEBI Act, Rules and Regulations, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force. 4.

PLACE OF PRESERVATION / MAINTENANCE

The Listing Records shall be preserved / maintained at the Corporate Office of the Company unless any other law requires it to be maintained at the Registered Office or any other place, in which case the same shall be kept at such place.

CLASSIFICATION OF DOCUMENTS

1. Documents shall be classified in the following categories
 - a) Mandatory under governing laws
 - b) Non-Mandatory
2. Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.
3. All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
4. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

Manner of Preservation of Documents:

- a) Methodology of preservation: The Company shall primarily utilise any one / combination of the following methods in preserving the records:
 1. Department or Function wise
 2. Subject or topic wise
 3. Chronologically
 4. Such other method as the Department heads may consider appropriate, as to fulfil the following objectives:
 - i. to meet the legal standards for protection, storage and retrieval
 - ii. to optimize the use of space and minimise the cost of records retention.

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b) Storage and Security Condition:

The record should be stored in conditions that are secure and clean with low risk of damage. Records of non-paper format shall require special storage conditions and handling process, after taking into account their specific charter. Similarly, records of continuing value and requiring longer preservation shall require a higher quality of storage.

Duration of Preservation:

The Minimum retention requirement of the different categories of the Company records is provided in the Retention Schedule which is disclosed by way of annexure to the Policy. The Retention Schedule has classified the records in the following categories:

- a) The document whose preservation shall be permanent in nature
- b) Documents to be retained during active employment
- c) Documents to be retained for not less than eight (8) years from the date of termination of employment.
- d) Document with preservation period of not less than 8 years after completion of the relevant transactions
- e) Document with preservation period of not less than 8 years from the date of complaint resolved.
- f) Document with preservation period of not less than 8 years from the date of filing with Registrar
- g) Document with preservation period of not less than 8 years from the lapse of the Policy/ settlement claim
- h) Document with preservation period of not less than 8 years from termination of contract/ Agreement/ completion of purchase.
- i) Document with preservation period of not less than 8 years from the Financial year in which the latest entry is made of repayment or renewal of any deposit of which particulars are contained in the Register.
- j) Document whose records maintained under various other laws in force from time to time would applicable.

Accessibility and Confidentiality:

Records should be made accessible to all the concerned employee of the Company and other outside users not belonging to the Company, with permission of the respective Departmental heads. However, the Directors of the Company and the Company Secretary shall have complete access to all the records.

Any record containing confidential data will be made accessible only after the permission of the Board of Directors of the Company.

Manner of Public Disclosure of records published on the website of the Company.

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The documents required to be published on the website of the Company shall be hosted in the Website till the stipulated duration of time as provided under the various laws in force or for such longer time as the Directors of the Company or the Company Secretary so desire.

Destruction of Records:

Records which no longer serve useful purpose should be destroyed. This would free filing equipment for storage or records currently needed in the conduct of business. Records destruction can also improve operational efficiency by reducing the quality of records to be searched in order to locate the needed information.

However, it be noted that all the confidential records shall be destroyed only after the approval of the Directors of the Company.

AMENDMENT

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

INDICATIVE LIST	
Permanent Preservation	Temporary Preservation
<ul style="list-style-type: none">- The memorandum and articles of the company- Documents relating to incorporation of the Company Register of members- Books and Documents relating to the issue of share certificates.- Register of Charges- Register under section 186 of the Act, 2013 for Loans/investment/ guarantees or securities provided- Register under section 187 (investment held in any other person)- Register under section 189 (register on contracts / arrangements in which directors are interested as per section 184 / 188 of the act- Minutes book of Board / Committee / general meeting, resolutions passed by postal ballot, resolutions passed by circulations.- Licenses, approvals, permissions, deed of indentures, mutation certificates, IPR's	<ul style="list-style-type: none">- Copies of all Annual Returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)- Register of renewed and duplicate share Certificate (not less than 30 years)- All notices pertaining to disclosure of interest of directors- All share certificates surrendered to a company (3 years from date of surrender)- Instrument creating a charge or modification (8 years from date of satisfaction of such charge)- Attendance Register for Board/ Committee meetings/ General Meetings (8 financial years)- Office copies of General Meeting Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years).

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<p>certificates or any other document which the Managing Director thinks expedient to preserve.</p> <ul style="list-style-type: none">- Register for destruction or disposal of Documents or Register.	<ul style="list-style-type: none">- Office copies of Board Meeting Notices, Agenda, notes on agenda and other related papers (8 financial years).- Disclosures prescribed under SEBI (LODR) Regulations, SEBI (PIT) Regulations, SEBI (SAST) Regulations (8 financial years)- Books of Accounts (8 financial years)- Annual Reports (10 financial years)
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