

SUNFLAG IRON AND STEEL COMPANY LIMITED

REGISTERED OFFICE : 33, MOUNT ROAD, SADAR, NAGPUR - 440001

Corporate Identification Number (CIN) – L 27100 MH 1984 PLC 034003

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POLICY ON DOCUMENT PRESERVATIONS

The provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 becomes applicable to all listed Company including the Company effective 1st December 2015.

Amongst others, the Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 dealt with the document preservations and to formulate the Policy on Document Preservations of the Company which provides :-

Preservation of Documents

The listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows :-

- (a) documents whose preservation shall be permanent in nature ;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions:

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

1. Preface

The Corporate Governance has been an integral part of the way, the Company - Sunflag Iron and Steel Company Limited have been doing its business since inception. As a part of the Corporate Governance and pursuant to the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'the Listing Regulations' or 'SEBI (LODR) Regulations'), the Board of Directors ('Board') of the Company has formulated, approved and adopted the following policy and procedures with regard to Document Preservations of the Company.

During the course of business, the Company generates several documents either in physical and/or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period. However, certain documents may be required to be maintained permanently during the lifetime of the Company. In order to maintain and preserve such documents, the Company needs to implement a well-considered, well-documented plan to ensure that they remain in good condition over a period of time.

A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents. This policy seeks to ensure that the Company's business is adequately documented that are then managed in accordance with best practices. The preservation of documents is the responsibility of all staff and users of archives of the Company to ensure their continuous and timely availability.

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical concern for any management. This policy attempts to provide a guideline for preservation of documents of the Company.

This policy is applicable to all documents pertaining to all the departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of care and confidentiality.

2. Definitions

- (a) **“Preservation”** is maintenance of documents, files and documents in usable form.
- (b) **“Documents”** means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.
- (c) **“Document Keeping”** means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.
- (d) **“Company”** means Sunflag Iron and Steel Company Limited
- (e) **“Board of Directors” or “Board”** means the Board of Directors of Sunflag Iron and Steel Company Limited, as constituted from time to time.

- (f) **“Policy”** means policy on Preservation of documents.
- (g) **“Storage Options”** means
- (h) **Online storage:** Documents are kept on a server or hard drive and are immediately available for use over a network. This option is best for documents that must be accessed frequently.
- (i) **Near-line storage:** Documents are stored on media such as optical disks in jukeboxes or tapes in automated libraries which are attached to a network. Their retrieval is slower than compared to the online storage, it is appropriate for documents that are occasionally accessed.
- (j) **Offline storage:** Documents are stored on removable media and must be manually retrieved. This option provides the slowest access and should be used for documents that are only rarely needed.
- (k) **“Listing Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

3. Legislative framework and standards

- The Companies Act, 2013
- The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- The Companies (Preservation and Disposal of Records) Rules, 1966

4. Creation of documents

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should :-

- i. facilitate necessary action by employees and their successors at any level at all points of time;
- ii. facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;

- iii. protect the financial, legal and other rights of the Company, its clients and any other people affected by its actions and decisions.

5. Maintenance of documents

Every employee of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

- Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitised in business processes.
- Physical documents to be maintained in books and files.
- All digital and physical records to be maintained at the registered office of the Company and no physical records can be migrated without permission of the respective Department Head.
- A reproduction of any original record on microfilm or on any other medium shall be certified by the respective Head of Department of the Company to be a true and accurate reproduction of the original of such document.

6. Disposal and destruction of documents

- All documents mentioned in **Category A** which are temporary in nature must be preserved for a period not less than eight (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. However, all documents mentioned in **Category B** need to be permanently preserved by the Company during its entire life time. Utmost care is to be taken to ensure that files are well preserved.
- The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Department Head for the purpose. Inspection of this register is restricted.

7. Disclosure

This Policy on Document Preservations of the Company shall be disclosed to the Stock Exchange(s) and also posted on the website of the Company (www.sunflagsteel.com) and a web link thereto shall be provided in the Annual Report of the Company.

8. Policy Review

This Policy is framed based on the requirements of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015. In case of any subsequent changes in the Regulations which make any of the provisions in the Policy inconsistent with the Regulations, the provisions of the regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

This Policy shall be reviewed by the Board of Directors as and when any changes are to be incorporated in the Policy due to change in regulations or as may be felt appropriate by the Board. Any changes or modification in the Policy would be approved by the Board of Directors and the decision of the Board in this respect shall be final and binding.

This Policy has been approved by the Board of Directors of the Company at their meeting held on 8 February 2016 and shall be disclosed on the website of the Company.

9. Policy severable

This Policy constitutes the entire document in relation to its subject matter. In the event that any term, condition or provision of this Policy being held to be a violation of any applicable law, statute or regulation, the same shall be severable from the rest of this Policy and shall be of no force and effect, and this Policy shall remain in full force and effect as if such term, condition or provision had not originally been contained in this Policy.

Category A

1. Proxy forms
2. Representation letters
3. Statutory registers maintained under the Companies Act, 2013
4. Circular resolutions
5. Annual reports
6. Consent and Resignation Letters received from the Directors
7. Central Government Approvals received
8. NSDL/CDSL Files
9. Annual financial statements including :-
Annual Accounts;

- Boards' Report;
Auditors Report
10. Declaration by Directors under section 164 of the Companies Act, 2013
 11. Declaration by Directors under section 184 of the Companies Act, 2013
 12. All documents under the Listing Regulations
 13. Notice of General Meetings and Board Meetings
 14. Documents on which the Common Seal of the Company has been affixed.
 15. Clippings of the Notice, etc. published by the Company
 16. Disclosures under takeover code
 17. Inward file giving information about the various correspondences received from outside agencies requiring secretarial action

Category B

1. Certificate of Incorporation
 2. Industrial License / Industrial Entrepreneur Memorandum (IEM)
 3. Any Trade or license Certificate
 4. Memorandum and Articles of Association as amended from time to time
 5. Counter folios of Share Certificates issued from time to time including transfer deeds / Demat Request Form
 6. Minutes Books of General, Board and Committee Meeting/s of the Company
 7. Register of Members including Allotment Register for issue of Securities of the Company.
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