

Policy for Preservation of Documents

1. Preface:

Most businesses will create and rely on hundreds, if not, thousands of documents every year. We all recognise the importance of retaining these documents until we can be sure they are no longer required, but what of the other resources we use?

It's as important for employees to retain correspondence as it is for their employer. Documents may relate to communications with a prospective client or even simple notification of a sickness absence. Many would be forgiven for believing that the latter can be deleted once it has been read, but what happens in the future?

Securities and Exchange Board of India has been pioneer body regulating the Corporate Governance aspects of the listed entities. In fact, the retention and preservation of various business documents is one of the core aspects for good Corporate Governance.

Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, SEBI has mandated all the listed entities to have a policy on Preservation of Documents.

The purpose of this documents to present a high level policy statement for Deepti Alloy Steel Limited ("**the Company**") regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 ("**the Act**"), SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**the Regulation**") and any other applicable laws to the Company.

Accordingly, the Policy named Policy for Preservation of Documents ("**the Policy**") has been formulated and adopted by the Board of Directors ("**the Board**") of the Company.

2. Objectives:

The Policy has been formulated and adopted by the Board for achieving the following objectives;

- ⇒ To provide guidance for preservation of Documents to the executives and staff working in the Company;
- ⇒ To create awareness amongst executives and staff working in the Company of importance of preservation of documents for making critical decisions and undertaking other activities that may have an impact on the operations of the Company;
- ⇒ To retain and preserve its documents as the basis for communication with a range of external stakeholders;
- ⇒ To have systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business;
- ⇒ To ensure that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources.

3. Policy Statement:

The policy contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed

4. Classification of Documents:

Based on the recommendation of the management of the Company, the Board of Directors has identified following classes for Preservation of various documents;

⇒ **Type: 1**

Documents that need to be preserved / retained permanently.

⇒ **Type: 2**

Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR or any other applicable laws.

⇒ **Type: 3**

Documents to be preserved electronically and archived as and when necessary.

⇒ **Type: 4**

Emails of all the employees for the period of 3 years.

⇒ **Type: 5**

Documents like budget papers, bank guarantees etc., which may be retained for less than 8 years.

5. Type of Record:

The Board of Directors has identified following major types of various documents which requires to be preserved under various statute.

- ⇒ Accounting and Finance records including Annual Financial statement
- ⇒ Tax records
- ⇒ Corporate Records including Certificate of Incorporation, Memorandum and Articles of Association of the Company, other statutory (mandatory and non-mandatory) & non-statutory Registers, Listing Agreement and approvals from other statutory authorities under the Companies Act, 2013, Listing Regulation and other statute
- ⇒ Legal Files and Records
- ⇒ Property Records
- ⇒ Insurance Records
- ⇒ Contracts entered into by the Company including Marketing Contracts
- ⇒ Payroll Records
- ⇒ Pension and retiral related Records
- ⇒ Personnel and HR Records
- ⇒ Programs & Service Records
- ⇒ Sponsorship Projects Records
- ⇒ Correspondence and Internal Memoranda
- ⇒ Electronic Documents including email retention and back up
- ⇒ Miscellaneous Records

6. Principle of Responsibility for Preservation of Documents:

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness tool helping the Company's and outside legal counsel to track down documents to handle the legal cases

7. Record Retention Schedule:

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is as given in the **Annexure I**.

8. Suspension of Disposal of Record:

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, such employee shall inform the Company Secretary and any further disposal of documents shall be suspended until such time as the Company Secretary, after consulting the Managing Director of the Company, with the due advice from the legal counsel, determine otherwise.

The Company Secretary in such case shall inform all employees by mail of the need to retain the documents and suspension of disposal of the same.

9. Back up of data:

Deepti Alloy Steel Limited ensures safety of staff as well as members of the general public, safeguard the documents and records and to enable a return to normal operating with minimal disruption.

In the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Company has made appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability. The Company ensures that the digital collections and technical infrastructure required to manage and access them can be restored in the event of an emergency.

10. Destruction of Documents:

- ⇒ Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short - term use only.
- ⇒ The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant prescribed period as provided in the Annexure I, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved.
- ⇒ 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. The entries in the register shall be authenticated by the Authorised Person.