

KAMDHENU ISPAT LIMITED
POLICY ON PRESERVATION OF DOCUMENTS
(Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

1. LEGAL FRAMEWORK

In Compliance with regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

The Board of Directors of Kamdhenu Ispat Limited (“the Company”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

EFFECTIVE DATE

This Policy is effective from December 1, 2015.

2. DEFINITIONS

A. “Board of Directors” or “Board” shall mean the Board of Directors of Kamdhenu Ispat Limited, as constituted from time to time.

B. “Company” means “**Kamdhenu Ispat Limited**”.

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

3. OBJECTIVE

The main purpose of the policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in to the following categories.

A. DOCUMENTS OF A PERMANENT NATURE

The documents of a permanent nature (listed in **Annexure 1**) 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. DOCUMENTS TO BE MAINTAINED AND PRESERVED FOR A SPECIFIED TIME PERIOD

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure-2**) shall be preserved by the Company for the term not less than eight years 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 eight years.

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 of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

5. PERIODICAL REVIEW OF THE POLICY.

The policy will be reviewed periodically by the Management and amendment(s), if any to the same will be done subject to the approval of the Board of Directors.

6. RECORD APPRAISAL

The Company shall at regular intervals carry out the appraisal of the records. The purpose of the appraisal process shall be to ensure that the records are examined at the appropriate time to determine (i) whether they need to be retained for a longer period as they are still in use; or (ii) whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the concerned Department Head of the Company to whom the concerned Records belongs.

7. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

8. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the Board of Directors of the Company. 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. The entries in the register shall be authenticated by the authorised person by the Board.

This applies to both Physical and Electronic Documents.

9. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

10. AMENDMENTS

The Board may amend, modify or revise any or all clauses of this Policy in accordance with the applicable provisions of the Listing Regulations and amendment(s) thereto notified by the Securities and Exchange Board of India and/or Stock Exchanges, from time to time. However, amendments in the Listing Regulations shall be binding even if not incorporated in this Policy.

ANNEXURE 1

Documents whose preservation shall be permanent in nature:

Sl. No.	Nature of Document(s)
01	Certificates of Incorporation/ Certificates/ Licenses obtained from any statutory authority
02	Certificate for commencement of Business
03	Memorandum of Association and Articles of Association as originally filed and updated from time to time
04	Agreements made by the Company with Stock Exchanges, Depositories etc.
05	Statutory Registers required under applicable laws
06	Audited financial statements
07	Minutes of General Meeting
08	Minutes of Board Meeting
09	Minutes of various Committee Meetings
10	Material Agreements/Contracts
11	Orders issued by Courts/Statutory bodies
12	Investment Documents/proofs including certificates etc.
13	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

ANNEXURE 2

Documents with preservation period of not less than eight years after completion of the relevant transactions:

Sl. No.	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s) along-with certificates and documents annexed thereto
03	Insurance Policies/ Claims under various policies
04	Correspondences with Departments/shareholders
05	Non-Statutory Registers/Documents
06	Films, Videos, CDs, DVDs, tapes etc.
07	Copies of Notices, Agenda papers for meetings of the Board and Committees and General Meetings thereof along-with Notes on Agenda and other related / supporting documents.
08	Copies of newspaper advertisements and publications
09	All consents, notices, disclosures received from the directors and KMPs along with any amendment thereto
10	Annual financial statements including annual accounts, directors' report, auditors' report
11	Instruments creating / modifying / satisfying the charge
12	Scrutinizer's Report, Register of Postal Ballot, Postal Ballot forms, office copies of the notices, other related documents
13	Forms and returns filed with MCA / RBI or with any other statutory authority
14	Documents relating to Court cases / CBI cases / Police cases / Civil Suits / Labour Court Cases / Arbitration cases etc.
15	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time