



PRESERVATION OF DOCUMENTS POLICY

INTRODUCTION:

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), the Board of Directors (the “**Board**”) of STEEL EXCHANGE INDIA LIMITED has adopted this Policy at its meeting held on February 10, 2016, for Preservation of Documents, as required under applicable regulations.

OBJECTIVES:

To determine preservation period for records/documents based on their reference value and legal requirements, the policy classifies the documents into two categories:

1. **Permanent Documents:** These are the documents which need to be preserved permanently.
2. **Temporary Documents:** These are documents which need to be preserved for a specific period of time.

DEFINITIONS:

In this policy unless the context otherwise requires

- a. “**Act**” means the Companies Act, 2013 and rules made there under, as amended from time to time
- b. “**SEBI Regulations**” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time
- c. “**Company**” means STEEL EXCHANGE INDIA LIMITED
- d. “**Document**” includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- e. “**Key Managerial Personnel**” or “**KMP**” shall have the same meaning ascribed to it under the Act.
- f. “**Board**” or “**Board of Directors**” shall mean the Board of Directors of STEEL EXCHANGE INDIA LIMITED, as may be re-constituted from time to time
- g. “**Financial Year**” shall have the same meaning ascribed to it under the Act.
- h. “**Electronic Form**” with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.



SCOPE:

These guidelines will be valid for determining preservation period for commercial and legal records; and will be applicable to all locations of the Company.

RESPONSIBILITY:

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

PRESERVATION PERIOD:

The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made; the preservation period of agreements starts with the financial year in which the agreement period expires. For determining the preservation period, the records are categorized into following three categories:

Category & Description	Period of Preservation
Chartered Documents permanent in nature and Statutory Records and Registers and other Records which will have a permanent value for the Company such as licenses, certificates, sanctions, approvals, etc. from Government/ Statutory Bodies, etc,	Permanent
Documents that are not permanent in nature and Records and Records/documents required to be maintained as per the statutory requirements and having higher reference value i.e. Books of Account, records having contractual/legal implications which need to be preserved for a prescribed periods per statutory requirement.	To be preserved for a period of 8 to 12 years.

PRESERVATION LOCATION:

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.



MODE OF PRESERVATION:

Records/documents may be preserved either physically or in electronic form.

DESTRUCTION OF RECORDS:

The records/documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal.

GENERAL AUTHORISATION:

The Policy shall be reviewed on a periodic basis and the Chairman and Managing Director / Whole-time Directors and the departmental head concerned/ Company Secretary are authorized to make such changes as may be deemed necessary or as warranted by law.
