

POLICY ON PRESERVATION OF DOCUMENTS

PREFACE

The Board of Directors (the “Board”) of Sagardeep Alloys Limited (the “Company”) has adopted the following policy with regard to preservation of Documents. This Policy has been formulated in accordance with Regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015. This Policy shall be known as “Policy for Maintenance and Preservation of Documents”.

PURPOSE OF THE POLICY

The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under Regulation 9 of Listing Regulations, 2015.

TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The company shall maintain and preserve documents as specified hereunder:

Category (A)

The documents of permanent nature (listed in Annexure I) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company

Category (B)

The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in Annexure-II) shall be preserved by the Company for the term not less than eight year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years. For the purpose of this policy, document may include the following:

- i. ‘books and papers’ as defined in clause 12 of section 2 of the Companies Act, 2013;
- ii. ‘books of accounts’ as defined in clause 13 of section 2 of the Companies Act, 2013;
- iii. ‘documents’ as defined in clause 36 of section 2 of the Companies Act, 2013;
- iv. ‘registers’ as defined in clause 74 of section 2 of the Companies Act, 2013

Further, the company may deeming fit and possible from time to time maintain above mentioned documents in electronic form to the extent possible.

ROLES & RESPONSIBILITIES

The Authorized Person and Compliance Officer of the Company shall be responsible for maintenance and preservation of documents in terms of this policy and to report thereon to Audit Committee periodically. The Audit Committee of the Company shall periodically review report(s) from Authorized person and Compliance Officer and decide the category for preservation of documents.

AMENDMENT

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. This policy as amended from time to time shall be made available at the Web site of the Company.

Annexure I

Documents whose preservation shall be permanent in nature:

Sr. No.	Nature of Document(s)
1.	All documents and Information originally filed with ROC for Incorporation of Company
2.	Memorandum of Association and Articles of Association as originally filed and updated from time to time
3.	Register of Members
4.	Minutes of General Meeting
5.	Minutes of Board Meeting
6.	Minutes of various Committee Meetings
7.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

Annexure II

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

Sr. No.	Nature of Document(s)
1.	Books of Accounts
2.	Annual Return(s)
3.	Register of Debenture holders
4.	Index of Debenture holders
5.	Statutory Registers
6.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.