

POLICY ON PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015]

EFFECTIVE DATE AND POLICY ENFORCEMENT

The Policy shall be effective from 1st day of December, 2015.

PURPOSE OF POLICY

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy.

This policy categorizes the records that will be preserved indefinitely without any time limit and the records that will be preserved for specified period of time and outlines responsibilities to create, maintain and lawfully dispose of the records.

DEFINITIONS

- i. **"Company"** means "Maithan Alloys Limited";
- ii. **"Board of Directors" or "Board"** shall mean the Board of Directors of Maithan Alloys Limited;
- iii. **"Listing Regulations"** means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- iv. **"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.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

OBJECTIVE OF POLICY

This Policy mechanism provides the comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- c) Systematic disposal/destruction of Company's non-current records that have outlived their administrative usefulness.

CLASSIFICATION

For the purpose of achieving the above objectives, the documents covered as per this Policy have been divided into two categories:

- i. The documents (listed in **Annexure - 'A'**) that 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.
- ii. The documents (listed in **Annexure - 'B'**) that shall be preserved by the Company for the term not less than eight years after completion of the relevant transaction.

MODES OF PRESERVATION

The documents may be preserved in any of the following modes:

- i. Physical Mode; or
- ii. Electronic Mode.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents must be safely destroyed or discarded as soon as practicable. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

AMENDMENTS

The Board is authorized to make alterations, amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy as considered appropriate, subject to the applicable laws. Further, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

ANNEXURE - 'A'

RECORDS TO BE PRESERVED PERMANENTLY

| Item No. | Records |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | Certificate of incorporation |
| 2. | Certificate for commencement of business |
| 3. | Memorandum and Articles of Association |
| 4. | Material Agreements/Contracts. |
| 5. | Minute Books of General Meetings, Board and Committee Meetings |
| 6. | Statutory Registers required and maintained under Companies Act, 2013 |
| 7. | Authorization / licenses obtained from any statutory authority |
| 8. | Policies of the Company framed under various regulations |
| 9. | Documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities. |
| 10. | Any other document as may be required to be maintained permanently in terms of applicable law(s) maintained and preserved from time to time. |

ANNEXURE - 'B'

RECORDS TO BE PRESERVED FOR MINIMUM PERIOD OF EIGHT YEARS

| Item No. | Records |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------|
| 1. | Annual Reports of the Company. |
| 2. | Annual Returns. |
| 3. | All notices pertaining to disclosure of interest received from Directors and KMPs along with any amendment thereto |
| 4. | Copy of newspaper advertisement or publications. |
| 5. | Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases. |
| 6. | Non-Statutory Registers/Documents. |
| 7. | Notice of General Meeting and related papers. |
| 8. | Notice, Agenda, notes on Agenda of Board and Committee Meetings and related papers. |
| 9. | Any other document as may be required to be maintained in terms of applicable law(s) maintained and preserved from time to time. |