

# **SHRI KANHA STAINLESS LIMITED**

## **POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS**

<b>Version</b>	<b>Summary of Changes</b>	<b>Board Approval</b>	<b>Date of Release</b>
<b>Version 1</b>	<b>Initial</b>	<b>20.03.2025</b>	<b>20.03.2025</b>

## **1. BACKGROUND**

Pursuant to Regulation 30(8) and Regulation 46 of the SEBI Listing Regulations, all listed companies are required to host on its website various information required under the SEBI Listing Regulations and such disclosures shall be hosted on the website of the listed entity for a minimum period of five (5) years and thereafter as per the archival policy of the listed entity, as disclosed on its website, this Archival Policy (the "Policy") has been framed to provide guidelines for archival of records and documents.

The Board of Directors of the Company approved this Policy on 20<sup>th</sup> March 2025. This Policy will be effective from the date of listing of equity shares of the Company.

## **2. OBJECTIVES OF THE POLICY**

Pursuant to Regulation 30(8) of the SEBI Listing Regulations, the Company shall disclose on its website all such events or information which has been disclosed to the Stock Exchanges under Regulation 30 of the SEBI Listing Regulations.

Such disclosures shall also be hosted on the Company's website for a minimum period of five (5) years, as statutorily required, and thereafter as per the archival policy of the Company. The Policy shall be disclosed on the Company's website.

The major objectives of the Policy are:

- (a) Identification of information, documents, events, etc. which are required to be disclosed on the website of the Company;
- (b) Ensuring that all the information is disclosed at the relevant time and with proper link, and to maintain unanimity every time;
- (c) Ensuring that all the information/ documents/ events disclosed on the website of the Company, unless otherwise specified under the Companies Act, 2013, shall remain on the website for the period of five (5) years from the date of disclosure of such information/ documents/ events;
- (d) Ensuring that after completion of five (5) years from date of disclosure of the respective documents/ information/ events, same should be moved to the respective archives folder on the website of the Company;
- (e) Ensuring that documents/ information/ events which are required to be uploaded on the website of the Company for a particular period, shall be deleted after the due date without movement in archives folder; and
- (f) Ensuring that certain documents like policies of the Company, codes of conduct and other documents which are required to be continuously displayed on the website, shall not be archived.

### **3. POLICY:**

#### **I. PRESERVATION OF DOCUMENTS AND RECORDS**

- a. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the Rules made there under, the Secretarial Standards and the Listing Regulations and other applicable law, rules, regulations (collectively, called "Statutory Provisions") and internal policies of the Company, in force.
- b. Documents and Records which are required to be preserved by virtue of applicable laws and regulations shall be preserved either permanently or for such periods as may be mandated by applicable laws from time to time.
- c. Documents and Records which are required to be preserved for a period of not less than 8 (eight) years after completion of the relevant transactions (or such time period stipulated in the Listing Regulations and other laws and statutes applicable to the Company from time to time) shall be preserved for such stipulated time period as specified by the relevant Head of Departments of the Company from time to time.

#### **II. MODES OF PRESERVATION**

- a. The Documents may be preserved either in physical form or electronic form.
- b. The relevant Head of Departments of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person).
- c. The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- d. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure integrity and confidentiality of the Documents and prohibit unauthorized access.
- e. The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

#### **4. DISPOSAL OF DOCUMENTS AND RECORDS:**

Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed or purged in one of the following ways with the prior written approval of any one of the Key Managerial Personnel of the Company appointed under the Companies Act, 2013 or as procedure specified by law:

- a. Recycle non-confidential paper records; or
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.

## **5. AMENDMENTS**

The Company may review and revise this Policy from time to time. The Board of Directors of the Company shall have the right to review or amend this Policy from time to time so that the Policy remains complied with applicable legal requirements.

## **6. DISCLOSURE ON WEBSITE**

The policy shall be continuously hosted on the website of the Company after the approval of the Board of Directors and after every amendment/ updating thereof.