

CHASE BRIGHT STEEL LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. INTRODUCTION

Securities and Exchange Board of India (SEBI) notified SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) vide its notification dated 2nd September, 2015 to consolidate and streamline the provisions of existing listing agreements for different segments of the capital market. The aforesaid Regulations shall come into force on the ninetieth day from the date of its publication in the Official Gazette i.e. 1st December, 2015.

In terms of Regulation 9 of the Listing Regulations, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows -

- (a) documents whose preservation shall be permanent in nature ;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity *may* keep documents specified in clauses (a) and (b) in electronic mode.

The Board of Directors (“the Board”) of Chase Bright Steel Limited (the “Company”), adopted this policy namely “Policy for Preservation of Documents” on 9th November, 2015 with regard to preservation and archival of documents, in compliance with the requirements of Listing Regulations (including any subsequent amendment thereto or modification thereof).

2. POLICY OBJECTIVE

The objective of the policy is systematic identification, categorization, maintenance, review, retention and archival of documents received or created in the course of business..

3. APPLICABILITY

This Policy shall be applicable to the Company with effect from 1st December, 2015.

4. SCOPE OF POLICY

The constituents and definition of a document is a subjective matter and significantly changing. The preservation of the documents not included in the identified categories should be determined primarily by the application of the law governing preservation of such document, if any, or general guidelines affecting such documents as well as any other pertinent factors as maybe determined by the Board of Directors or the concerned Functional Head in the best interest of the Company.

5. DEFINITIONS

In this Policy, the following words and expressions, unless the context otherwise requires, shall have the following meanings ascribed to them:

“Archive” is an accumulation of historical records or the physical place / electronic mode where they are located.

“Board of Director” or **“Board”** means the Board of Directors of Chase Bright Steel Limited, as constituted from time to time.

“Company” means Chase Bright Steel Limited.

“Document” means notice, minutes, register, returns, records, forms, agreement, memorandum or any other document or record maintained by the Company or person in the transaction of business or the conduct of affairs of the Company (whether maintained in physical or in electronic form).

“Maintenance” means keeping registers and records, either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such registers and records.

“Policy” means Policy for Preservation of Documents.

“Preservation” means to keep in good order; to prevent from being altered, damaged or destroyed.

“Year” means the period ending on the 31st day of March every year.

All other words and expressions used and not defined in this Policy, but defined in various Acts, Rules and regulations to which the document / record pertains to shall have the meanings as respectively assigned to them in such acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

6. RESPONSIBILITY

All Head of Departments & Functional Heads are responsible for the preservation of the documents in their work area and their decision to retain / preserve or destroy documents pertaining to their area of work / operations.

7. DOCUMENTS TO BE PRESERVED

The list of documents with preservation period covered under this Policy appended in **Annexure - 1** to this Policy and which is an illustrative list and not an exhaustive list.

8. GENERAL RULE GOVERNING POLICY ON PRESERVATION OF DOCUMENTS

(a) The documents not covered under the aforesaid categories shall be preserved as guided by the law governing preservation of such document(s), if any, or general guidelines affecting such documents.

(b) If any document is relevant to litigation or anticipated to be relevant to litigation (i.e., a dispute that could result in litigation), then such documents shall be preserved permanently.

(c) Notwithstanding anything contained above, the Statutory Authority governing these documents may, by order in writing, direct any company to preserve any of the documents mentioned beyond the period specified for preservation.

(d) In case of ambiguity, the Board is the authority to decide the preservation period of such documents.

9. ARCHIVAL MECHANISM & POLICY

The documents required to be published on the website of the Company shall be hosted on the website till minimum period of 5 years.

Thereafter, the same shall be transferred to the Archive Documents section and be kept for a period of 1 year before it is removed. However, in case of any updation in the disclosure of published record, the old record can be removed from the website of the Company provided it does not lead to contravention of any law(s) or regulation(s) in force.

10. REVIEW OF THE POLICY

The Policy shall be reviewed as may be deemed fit by the Whole-Time Director, Chief Executive Officer, Chief Financial Officer and Company Secretary of the Company along with the respective Functional Heads who would identify the documents and the time period for retention of documents and recommend the same for the approval of the Board.

Any subsequent amendment / modification in the Regulations (including any circular, notification, press release) governing this Policy, shall automatically apply upon the policy and the Policy will be deemed to be modified to that extent.

This Policy shall be hosted on the website of the Company.

Date : 27.10.2015

Illustrative list of the Records / Documents to be preserved

Secretarial Records / Documents

S1	Record / Document Type	Preservation Period
1	All Documents and Information as originally filed with Registrar of Companies for Incorporation of Company;	Permanent
2	Register of Renewed and Duplicate Share Certificates	Permanent
3	Register of Members along with the index	Permanent
4	Register of Charges	Permanent
5	Foreign Register of Members shall be preserved permanently, unless discontinued	Permanent
6	The minute books of Board, Committee and General Meetings	Permanent
7	Register of Contracts with Related Party and Contracts and Bodies etc. in which Directors are interested	Permanent
8	Register of Loans, Guarantee, Security and Acquisition made by the Company	Permanent
9	Register of Investments not held in its own name by the Company	Permanent
10	Minutes of all Meetings of the transferor company, as handed over to the transferee company under a scheme of arrangement, shall be preserved permanently by the transferee company, notwithstanding that the transferor company might have been dissolved.	Permanent
11	Register of Deposits	For a minimum period of 8 years after completion of the relevant transactions
12	The instrument creating / modifying charge from the date of satisfaction of charge by the company	For a minimum period of 8 years after completion of the relevant transactions

13	Register of Debenture Holders or any Other Security Holders along with the index from the date of redemption of debenture or securities	For a minimum period of 8 years after completion of the relevant transactions
14	Copies of all annual returns prepared and copies of all certificates and documents required to be annexed thereto from the date of filing with the Registrar	For a minimum period of 8 years
15	Notice of interest of Directors	For a minimum period of 8 years after completion of the relevant transactions
16	The Directors' Attendance Register	For a minimum period of 8 years after completion of the relevant transactions
17	Office copies of Notices, Agenda, Notes on Agenda and other related papers	For a minimum period of 8 years after completion of the relevant transactions
18	Office copies of Notices, Scrutiniser's report, and related papers	For a minimum period of 8 years after completion of the relevant transactions
19	ROC filings	8 years from the date of filings

Other Records / Documents

S1	Record / Document Type	Record / Document Type	Preservation Period
1	Insurance Records	1. Insurance Policy Execution / renewal Certificate 2. Insurance Claims under various policies	8 years from lapse of the Policy / settlement of claim.
2	Contract / Agreement / Purchase Orders		8 years from the termination of Contract / Agreement / completion of purchase.

3	SEBI / Stock Exchange Records	1. Quarterly / Half Yearly / Annual /other compliances submitted from time to time 2. Listing Agreement	8 years from the date of submission Permanent
4	Miscellaneous Licenses obtained from Statutory Authorities		Permanent
5	Property records	1. Agreements / Contracts 2. Documents relating to acquisition and sale of property	Permanent
6	Legal	Correspondences with Courts / other statutory bodies regarding any petition/ case / suit etc.	Permanent or the term as may be deemed fit by the Head of the Department
7	Personnel Records	Pension and retiral related statutory Records Payroll, Personnel and HR Records	Permanent 8 years from the date of termination of employment
8	Labour Law Statutory Records		Permanent
9	Finance	1. Audited Financial Statements 2. Auditors Reports Books of Accounts & Vouchers	Permanent 8 financial years following the relevant Financial Year
10	Cost Audit Records		8 financial years following the relevant Financial Year
11	Regulatory Records		For a minimum of 8 years
12	Taxation	1.Registration / Amendment Certificate under various relevant	Permanent

		provisions in force. 2. Tax-Exemption Documents and related correspondence 3. Tax Return	Permanent 8 years or till the time Assessment is completed, whichever is later.
13	Miscellaneous	Records pertaining to various other laws in force	Records maintained under various other laws in force from time to time would be acceptable