



ARCHIVAL POLICY

OF

BHUSHAN STEEL LIMITED



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1.0 Legal Framework

1.1 The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”). The Listing Regulations are effective from December 1, 2015. Regulation 30 (8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 specifies that every listed entity shall formulate an Archival Policy for disclosures hosted the website of the Company.

2.0 Objectives of the Policy

The main objectives of this Policy are:

- a) Identification of information, documents, events, etc. which are required to be disclosed on the Website of the Company;
- b) To prescribe the policy for archival of disclosures of various events/information made by the Company to the stock exchanges(s) under the Listing Regulations and hosted on the Website of the Company, and which are eventually archived and transferred to the Archives Folder of the Website of the Company after the prescribed period of 5 (Five) years from the date of disclosure of the respective events/information; and
- c) Certain document like policies, codes of conduct and other documents which are required to be continuously displayed on the Website in accordance with the applicable provisions of the Act and the Listing Regulations, shall not be archive.

3.0 Policy

The Company regularly sends various information, financial statements, notices and other disclosures, as required under Listing Regulations to the stock exchanges where securities of the Company are listed.

Regulation 46 read with Regulation 62 of the Listing regulations requires the Company to maintain a functional website containing basic information about the Company and other prescribed details.

Regulation 30(8) of the Listing regulations requires the Company to disclose on its Website all such events or information which has been disclosed to stock exchange(s) under the Listing Regulation, and such disclosures shall be hosted on the Website of the Company for a minimum period of five years and thereafter records of such events/information is to be maintained as per the archival policy of the Company.

Accordingly, the company shall after making disclosures to the stock exchange(s) of the events/information in accordance with the applicable provisions of the Act and the Listing Regulations shall also host such information on its Website.

The information so uploaded on the Website, shall be retained for a period of 5 (Five years).

The aforesaid period of 5 (five) years shall be reckoned from the date of such events or information being placed on the Website of the Company for the first time.

The events/information so disclosed and uploaded on the Website shall, in terms of Regulation 30(8) of the Listing regulations, be archived after the expire of 5 (Five) years from the date of such posting and shall be moved and placed under the 'Archives Folder' for any future reference.

The documents/disclosures/information shall be kept under in the Archives Folder till such time as may be required by Act/ Listing Regulations and/or provisions of any other applicable law.

The Company, in accordance with the provisions of Regulation 46(3)(b) of the Listing Regulations, shall ensure to update any change in the content of the Website within 2 (two) working days of such change.

The Head of IT Department of the Company, who is managing the Website, shall be responsible for updating the Website and the Archives Folder on the Website from time to time, by placing the records/documents/information therein.

The Head of IT Department shall also submit a statement as to the records moved in the Archives Folder of the Website, on half yearly basis to the Company Secretary of the Company for placing the same before the Board.

4.0 General

In case of any subsequent changes in the provisions of the Act and/or Listing Regulations which makes any of the provisions in the Policy inconsistent with the Act and/or Listing Regulations, the provisions of the Act and/or Listing Regulations, as the case may be, shall prevail over the Policy and the provisions in this Policy will be modified in due course to make it consistent with provisions of applicable law(s). This policy shall be reviewed by the Board as and when any changes are to be incorporated in this Policy, due to change in Listing Regulations or the Act.

The board of Directors of the Company may, subject to the applicable law, is entitled to amend, modify, suspend or rescind this Policy, at any time.

Any ambiguities, interpretative issues, difficulties will be resolved by the Board of Directors of the Company in line with the broad intent of this Policy read with the applicable provisions of the Act, rules and regulations made thereunder, and the Listing Regulations.