



PRESERVATION OF DOCUMENTS POLICY

OF

BHUSHAN STEEL LIMITED



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1. Introduction

The Board of Directors (the "Board") of Bhushan Steel Limited (the "Company" at its meeting held on 14th November, 2015, has approved the Policy for Preservation of Documents of the Company.

The Policy will be applicable to the Company with effect from 1 December, 2015.

This policy can be modified/amended/alterd by the Board of Directors of the Company except in case of any statutory modification/amendment/alteration of the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, which shall be deemed to be implemented in the Policy immediately on such notification for modification/ amendment/alteration etc. coming into effect.

2. Purpose

This Preservation of Documents Policy lays down the procedure, mode and tenure upto which the Company's documents will be preserved. The purpose of this Policy is to lay down the procedure for preservation of documents, files, records and registers carrying information of the Company and any other article(s) belonging to the Company in terms of the requirements of Regulation no. 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015.

3. Scope

This policy applies to all the papers, documents, deeds, instruments, registers, etc. prepared and/or received by the Company under the requirements of and in compliance with the provisions of the Companies Act, 2013, rules and regulations made thereunder, Rules and Regulations framed by Securities and Exchange Board of India and such other laws, rules, regulations and guidelines, etc. as may be applicable to the Company from time to time.

4. Definitions

- a. "Book and paper" and "book or paper" shall have meaning as defined under Section 2(12) of the Companies Act, 2013 and Rules prescribed thereunder.

- b. "Books of account" shall have meaning as defined under Section 2(13) of the Companies Act, 2013 and Rules prescribed thereunder.
- c. "Document" shall have meaning as defined under Section 2(36) of the Companies Act, 2013 and Rules prescribed thereunder.
- d. "Financial Statement" shall have meaning as defined under Section 2(40) of the Companies Act, 2013 and Rules prescribed thereunder.
- e. "Register of Companies" shall have meaning as defined under Section 2(74) of the Companies Act, 2013 and Rules prescribed thereunder.
- f. Words and expressions used and not defined in this Policy but defined in the Securities Contracts (Regulation) Act, 1956 or the Securities and Exchange Board of India Act, 1992 or the Depositories Act, 1996 shall have the meanings respectively assigned to them in those Acts.

5. Common Standards for Preservation of Documents

To preserve the Documents effectively, every employee of the Company, involved with creation/management of any Document must share a common responsibility for their security and protection. Furthermore, these common preservation standards also need to be understood and applied by every person who intends to access the Archives. To achieve this, the Documents must always be:

5.1. Placed, handled, consulted and/or displayed in a way which minimizes the risk of damage and takes due account of their size, shape and physical condition.

5.2. Placed, handled, consulted and/or displayed in a safe and secure location.

5.3. Moved with due care between locations.

5.4. Placed, handled, consulted and/or displayed under appropriate preservation conditions (e.g. avoid areas of unsuitable temperature and humidity, dust etc. Proper account must be kept, at all times, of the precise location of all records, including those temporarily withdrawn or undergoing administration – referencing, cataloguing etc.

5.5. Withdrawn or issued records must be returned to their permanent place of storage immediately after any examination, treatment or consultation is completed.

5.6. Concerned employee must be alerted, and action taken, where serious damage or loss has occurred, or is likely to occur. This includes physical misuse, maltreatment, or theft of records.

6. Period of preservation of Documents

The period of preservation of the documents by the Company pursuant to this Policy shall be as follows:–

A Documents whose preservation shall be permanent in nature:

- 1 Certificate of Incorporation of the Company
2. Licenses and Statutory Approvals
3. Statutory Registers required under applicable laws
4. Memorandum of Association and Articles of Association as originally filed and updated from time to time
5. Register of Members
6. Index of Members
7. Minutes of General Meeting
8. Minutes of Board Meeting
9. Minutes of various Committee Meetings
10. Material Agreements / Contracts
11. Orders issued by Courts/Statutory bodies
12. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

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

- 1 Books of Accounts
- 2 Annual Return(s)
- 3 Register of Debenture holders
- 4 Index of Debenture holders
- 5 Non-Statutory Registers
- 6 Tax related records and documents
- 7 Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

7. Storage of Records and Documents

Maintaining an optimum storage facility is a core function of preservation of Documents. This practice, in particular, should be recognized as the primary means of guaranteeing the physical security and long-term survival of records. The Company shall comply with the following basic directives in regard to the storage and retention of records:

7.1. Sufficient space must be made available for the permanent and safe storage of the Company's Archives.

7.2. All permanent and temporary storage areas must be safe and secure to minimize the risk of theft or malicious damage e.g. access to stores should be carefully controlled; access points should be fitted with barriers and adequate locking systems; storage area should be patrolled at regular intervals; storage area should be equipped with sensitive security alarm systems.

7.3. All permanent and temporary storage areas must be structurally sound and sufficiently strong to withstand adverse weather conditions.

7.4. All permanent and temporary storage areas should be fireproof and moisture-proof in order to reduce the possibility of any serious accidental or malicious damage.

7.5. Environmental conditions in permanent storage areas must be carefully controlled and regulated to reduce the threat of atmospheric contamination.

8. Preservation of documents in electronic form

Whenever any document or record is required to be maintained by the Company in electronic form as per the requirements of any law or rules or regulations etc. or where it is decided by the Board to preserve any document or record in electronic form, the company shall make necessary arrangements for preservation of such documents and records in electronic form. The Company will comply with the following basic requirements for preserving documents in electronic form –

8.1. The information in the electronic record of the document shall be capable of being displayed in a legible form.

8.2. The documents or records maintained in electronic form shall be secured by means of user ids and passwords or such other security features as may be decided by the Board of Directors.

8.3. There shall be a proper system for storage, retrieval, display or printout of electronic records by the Company and such records may be disposed of as per laws, rules and regulations applicable to its preservation or in its absence, as per this Policy.

8.4. The back-up of the documents and records and other papers of the company maintained in electronic form, including at a place outside India, if any, shall be kept in servers physically located in India on a periodic basis.

9. Archiving on the Website of the Company

Every information, record or document that is uploaded or archived on the website of the Company as per the applicable provisions of various laws, rules, regulations etc. shall be maintained on the website of the Company for a continuous period of not less than 5 years and on completion of 5 years, the said information or record or document be updated or removed from the website of the Company. Every document which is removed from the website of the Company shall however be preserved by the Company as per this Policy.

10. Destruction/Disposal of Documents and Records

Upon the completion of period of preservation of any record or document, a list needs to be prepared for its destruction/disposal and the same be placed before the concerned Head of the Department (HOD) to which the record or document belongs for approval for destruction/disposal of such record or document giving reasons why the same would no longer be required. These approved lists will then be placed before the meeting of the Board of Directors along with the reasons, for final approval for its destruction/disposal.

11. Preservation of Documents beyond the period prescribed

Notwithstanding anything contained in this Policy, the Board of Directors of the Company may direct to preserve any of the documents mentioned in Clause 6 of this Policy beyond the period specified therein for retention and preservation of document.

12. Register of Documents destroyed/disposed

A record be kept of every record or document destroyed by the Company in a Register of Documents destroyed carrying details such as name of the record/document, date of creation, preservation period, Name of the HOD approving its destruction/disposal with date and reason, date of board meeting approving its destruction/disposal.