

MAHAMAYA STEEL INDUSTRIES LIMITED

DOCUMENT RETENTION AND ARCHIVAL POLICY

Approved by the Board of Directors at its meeting held on 6th January, 2016

LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

The Board of Directors of Mahamaya Steel Industries Limited (“the Company”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

This Policy will be applicable to the Company effective December 1, 2015.

1. DEFINITIONS

A. “Board”

Board shall mean the Board of Directors of Mahamaya Steel Industries Limited.

B. “Company”

Company shall mean “Mahamaya Steel Industries Limited”.

C. “Documents”

Documents shall mean all papers, records, files, books, etc., and the like as required to be maintained under any law or regulation for the time being in force.

D. “Listing Regulations”

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

3. OBJECTIVE

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

- Documents whose preservation shall be permanent in nature as given in **Annexure 1** attached to this Policy.
- Documents with preservation period of not less than eight (8) years after completion of the relevant transactions as given in **Annexure 2** attached to this Policy.

Provided further that the Company may keep the documents as specified above in electronic mode.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

5. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). 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.

7. ARCHIVAL OF DOCUMENTS

Documents mentioned in the annexures which are not required regularly can be archived by the concerned department in the following manner:

- a. Documents to be archived should be kept in the storage locations earmarked by the Company for the purpose in secured place or cupboard having access only by the authorized personnel.
If consider appropriate, services of external archival agencies may be utilized.
- b. Document should be stored in a way that preserves their integrity and readability and restricts access to authorized personnel only.
- c. The medium used to store document shall be such that those documents remain complete and legible throughout the required period of retention and can be made available to the Auditors or Regulatory Authorities upon request.
- d. The concerned department head should maintain a record of documents archived, box reference number and storage location etc.
- e. Electronic records ie e-mails, files should also be archived.

8. AMMENDMENTS

The Board may subject to the applicable laws 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. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

9. DISSEMINATION OF THE POLICY

This policy as amended from time to time shall be made available at the Web site of the Company

Annexure 1

Documents whose preservation shall be permanent in nature

S.No.	Nature of Document (s)
1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited financial statements
5.	Minutes of General Meeting
6.	Minutes of Board Meeting
7.	Minutes of various Committee Meetings
8.	Material Agreements/Contracts
9.	Orders issued by Courts/Statutory bodies
10.	Investment Documents/proofs including certificates etc.
11.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure 2

Documents with preservation period of not less than eight (8) years after completion of the relevant transactions

S.No.	Nature of Document (s)
1.	Books of Accounts
2.	Annual Return(s)
3.	Personnel Documents
4.	Insurance Policies/ Claims under various policies
5.	Correspondences with Departments/shareholders
6.	Non-Statutory Registers/Documents
7.	All Emails received from Internal and External Sources related to business issues
8.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.