



**GALLARD STEEL LIMITED**

Name of the Document	Policy on Preservation of Documents
Effective Date	01 <sup>st</sup> May, 2024
Approving Authority	Boards of Directors
Current Version	1.0

## **POLICY ON PRESERVATION OF DOCUMENTS**

***Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015***

***Approved by Audit Committee and Board of Directors Meeting held on 01<sup>st</sup> May 2024 and become applicable w.e.f from 01<sup>st</sup> May 2024***

<b>"Introduction"</b>	
	<p>The Board of Directors ("the Board") of Gallard Steel Limited ("the Company") has adopted this Policy on Preservation of Documents ("this Policy").</p> <p>This policy is framed as per the requirements of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") and shall be effective from 01<sup>st</sup> May 2024.</p>
<b>"Objective"</b>	
	<p>This Policy contains guidelines for identifying Documents that need to be maintained, the period of preservation of such Documents, and their destruction/disposal. This Policy aims to provide efficient and systematic control of the periodicity and destruction of business-related Documents.</p>
<b>"Definitions"</b>	
	<p>For the purposes of this policy, the following definitions apply:</p> <p><b>"Act"</b> means the Companies Act, 2013, and the Rules made there under, as amended from time to time.</p> <p><b>"Document"</b> means any documentary material in either paper or electronic form, generated or received by the Company including but not limited to an electronic document, CD-ROM, hard disk, email, microfilm, X-ray film, video tape, floppy disk, USB memory etc.</p> <p><b>"Register"</b> means the register of various documents maintained by the Company on paper or in electronic form of various documents.</p> <p><b>"Secretary"</b> as defined under Section 2(24) of the Companies Act, 2013 means a Company Secretary as defined in clause (c) of sub-section (1) of Section 2 of the Company Secretaries Act, 1980 who is appointed by a Company to perform the functions of a Company Secretary;</p>
<b>"Scope"</b>	
	<p>This policy applies to all the departments and business functions of the Company but, does not apply to personal or non-business information.</p>
<b>Mode and Periodicity of Preservation of Documents"</b>	
	<p>The Documents may be preserved in physical form or Electronic Form.</p>

	<p>The employee of the Company required to preserve the Document shall be an Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law.</p> <p>The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction, or anything that endangers the content, authenticity, utility, or accessibility of the Documents.</p> <p>The preserved Documents must be accessible at all reasonable times. Access may be controlled by an Authorized Person with preservation, so as to ensure the integrity of the Documents and prohibit unauthorized access.</p> <p>The documents which are required to be preserved shall be annexed as Annexure-A along with their timelines.</p>
<b>"Destruction of Documents"</b>	
	<p>The Documents should be destroyed at the end of the preservation period specified under Clause 5 of this Policy. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by employees who are disposing of the Documents. Electronic information, including e-mails that are no longer required to be retained, must be purged using appropriate techniques that ensure that the data cannot be reconstructed from the storage media on which it resides. Records stored on magnetic media must be destroyed by reformatting at least once. However, the backup copies of the records must also be destroyed.</p>
<b>"Responsibility"</b>	
	<p>Functional heads of respective Units shall be responsible for monitoring the implementation of this Policy.</p>
<b>"Review and Amendments"</b>	
	<p>The Board of Directors shall review this Policy as and when it deems necessary and approve changes, if any required from time to time in line with the statutory provisions. Any change to this Policy requires approval of the Board of Directors.</p>
<b>"Interpretations"</b>	
	<p>In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.</p> <p>In case of any clarification required with respect to this Policy, kindly contact the Secretary of the Company.</p>

**'ANNEXURE A'**

<b>Document Category</b>	<b>Document Type</b>	<b>Preservation period</b>	<b>Mode of Preservation</b>
Company Operations	<ul style="list-style-type: none"> <li>• Memorandum / Articles of Association</li> <li>• Certificate of Incorporation</li> <li>• Certificate of Commencement of Business</li> <li>• Licenses, certificates, approvals, and other such documents issued by the Central/State Government and any other statutory and/or regulatory body.</li> <li>• Orders, judgments of judicial authorities</li> <li>• Policies and Codes of the Company</li> <li>• Other Related Documents</li> </ul>	Permanent	Physical and/ or electronically
Tax and Finance records	<ul style="list-style-type: none"> <li>• Books of accounts, including inter-alia, financial statements, vouchers relevant to entry in books of accounts, audit records, invoices, expense records, bank records, etc. in accordance with the applicable provisions of Companies Act, 2013, Income Tax Act, and any other applicable laws.</li> <li>• Application/correspondence with Various Direct and Indirect tax authorities</li> <li>• Excise invoices/bills/challan Company Returns and Assessment Records.</li> <li>• Sales Tax documents</li> <li>• Loan-related Documents</li> <li>• Documents related to all other</li> </ul>	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
	<ul style="list-style-type: none"> <li>• Statutory Registers, returns, forms as required under various applicable laws/statutes/regulations, etc.</li> <li>• Notice, agenda, and notes to agenda of meetings of the Board and its Committees</li> <li>• Minutes of the meetings of the Board of Directors, Committees and shareholders</li> <li>• Office copies of Notices, scrutinizer's report and other documents related to meetings</li> </ul>	Permanent	Physical and/ or electronically

	<ul style="list-style-type: none"> <li>Attendance registers of the meetings of the Board and its Committees Statutory filings with the Stock Exchanges, SEBI, MCA, RBI, and any other statutory/regulatory authority</li> <li>Applications and approvals for issuance and listing of securities</li> <li>Press releases, publicly filed documents</li> <li>Land title deeds/ documents/ receipts Agreements pertaining to securities Other related Documents relating to litigations etc.</li> </ul>		
	Documents specified to be preserved for eight financial years under any applicable law/regulation/statute etc.	Eight financial years	Physical and/ or electronically
Secretarial records	<p>Statutory Registers, returns, forms as required under various applicable laws/statutes/regulations, etc.</p> <p>Notice, agenda, and notes to agenda of meetings of the Board and its Committees Minutes of the meetings of the Board of Directors, Committees and shareholders Office copies of Notices, scrutinizer's report, and other documents related to meetings</p>	Permanent	Physical and/ or electronically
	Attendance registers of the meetings of them Board and its Committees Statutory filings with the Stock Exchanges, SEBI, MCA, RBI, and any other statutory/regulatory authority Applications and approvals for issuance and listing of securities Press releases, publicly filed documents Land title deeds/ documents/ receipts Agreements pertaining to securities Other related Documents relating to litigations etc.	To be preserved until the matter is resolved/ settled be	

	Documents specified to be preserved for eight financial years under any applicable law/regulation/statute etc.	Eight financial years	Physical and/ or electronically
	Details relating to unclaimed/unpaid dividend	Seven years	Physical and/ or electronically
Production, Purchases records	<ul style="list-style-type: none"> <li>• Production procedures, production data, system-based records, MIS, rejections, etc.</li> <li>• Other production-related records required to be maintained under any applicable law/statute etc.</li> <li>• Purchase orders, annual contracts, quotations comparative quotation analysis, etc.</li> <li>• Bill of entry/bill of loading, shipping</li> </ul>	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Strategy/ projects	<ul style="list-style-type: none"> <li>• Documents relating to projects</li> <li>• Statistical information, negotiation drafts, analysis reports, etc.</li> <li>• Other related documents</li> </ul>	Five years beyond the life of the project/ assignment or period may be specified under applicable.	Physical and/ or electronically
Legal	Executed copies of contracts/ agreements entered by the Company	Eight years beyond the life of the contract or such period as may be specified under applicable law/statute	Physical and/ or electronically
	<p>Case files of all disputes/recovery with different authorities.</p> <p>Registration/Renewal Documents</p> <p>Documents relating to the development of intellectual property</p> <p>All Documents containing trade secrets</p> <ul style="list-style-type: none"> <li>• Original and supplementary license</li> <li>• Other Related Documents</li> </ul>	Permanent	Physical and/ or electronically

	Documents relevant to litigation or any potential litigation (a dispute that may result in litigation), claim, audit, investigation, or enforcement action.	Until the Legal Department of the The company determines that such Documents are no longer needed.	Physical and/ or electronically
Employment / Personnel records	<ul style="list-style-type: none"> <li>• Documents relating to individual personnel records, payroll, salary history, bonuses, performance reviews, etc.</li> <li>• Other personnel-related documents</li> </ul>	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Information Technology	<ul style="list-style-type: none"> <li>• Documents in relation to procurement of IT hardware, software, licenses, etc.</li> <li>• Operations &amp; User Manuals.</li> <li>• License and Information Security Register</li> <li>• Server logs</li> <li>• Disaster Recovery Site logs</li> <li>• Inventory of backup data</li> </ul>	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Marketing and Sales records	<ul style="list-style-type: none"> <li>• Sales &amp; Marketing Policies</li> <li>• Debit Note/Credit Notes</li> <li>• Credit Appraisal Forms &amp; Ratings</li> <li>• Agreements with Agents</li> <li>• Collection Advice</li> <li>• Related MIS</li> </ul>	Eight financial years or such period be specified under applicable law/statute etc.	Physical and/ or electronically
International	Documents governed by the jurisdiction of a foreign country	As per the requirement of the concerned	Physical and/ or electronically
Incidental or other business-related information	Drafts and preliminary versions of documents superseded by work, paper, and other transitory	As long as it remains relevant.	Physical and/ or electronically
	Any other Document relating to the business of the Company	180 days or as long as it remains current	Physical and/ or electronically

*Where the preservation period of Documents is not included in the above-identified categories, such period shall be determined by the application of the general guidelines affecting Document preservation identified in this Policy, as well as any other pertinent factors.*

*Any document not included above should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department.*

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