



CHAMAN METALLICS LIMITED

Policy for Preservation of Documents



POLICY FOR PRESERVATION OF DOCUMENTS

CHAMAN METALLICS LIMITED



GROUP

Benchmark of quality



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1. INTRODUCTION

- 1.1 Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Regulations') requires every listed entity to have a policy on Preservation of Documents.
- 1.2 Accordingly, Chaman Metallics Limited ('CML' or the 'Company') herein sets out a Policy for Preservation of Documents.

2. OBJECTIVE OF THE POLICY

The primary objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The other major objectives of the policy are:

- a. To Identify statutory registers and other records / documents of the Company which are required to be preserved;
- b. To classify the identified documents in two categories i.e.
 - (i) documents which need to be preserved permanently, and
 - (ii) documents which need to be preserved for a specific period of time;
- c. To guide employees of the Company in understanding their obligations in retaining and preserving the documents and records.



3. POLICY STATEMENT & RESPONSIBILITY

- 3.1 The corporate records of Chaman Metallics Limited (the “Company”) are its important assets.
- 3.2 The law(s) and regulation(s) requires the Company to maintain certain types of corporate records either permanently or for a specified period of time. Failure to retain the records could subject the employees and the Company to penalties and fines, cause the loss of rights, obstruct justice, adversely impact potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation. Thus, the Company expects all employees to fully comply with this Policy.
- 3.3 Notwithstanding anything stated above, if an employee has reasons to believe, or the Company informs the employee concerned, that Company records are relevant to litigation, or potential litigation then the employee must preserve those records until the Legal or Respective Department determines that the records are no longer needed.
- 3.4 The Company, from time to time may establish retention or destruction policies or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property. While minimum retention periods are suggested in the policy, the retention of the documents identified in those schedules and of documents not included in the identified categories should be determined by the Head of the Department, primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.



4. RECORD MAINTENANCE, BACKUP AND PRESERVATION

- 4.1 All records in physical form are to be maintained by the Respective Department(s) at the respective locations.
- 4.2 Electronic version(s) of all of records are to be maintained within the Company's centralized electronic record software database, which is to be maintained by the IT Services Department.
- 4.3 The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.
- 4.4 The preserved documents must be accessible at all reasonable times. However, access may be controlled by the concerned Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.
- 4.5 The Employee and the Company should make appropriate provision for the backup of its record to ensure their continued viability.
- 4.6 An indicative list of the documents / register along with time-frame of their preservation is provided in Annexure I
- 4.7 Notwithstanding anything contain above, in the event of major incident, the first priority of the company is the safety of their people(s), followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.



5. DISPOSAL / DESTRUCTION OF RECORD(S)

5.1 The documents of the Company which are no longer required as per the time schedule as prescribed in the Annexure I may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required.

5.2 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 in the format prescribed at Annexure II. The entries in the register shall be authenticated by the Authorized Person.

5.3 Temporary records can be destroyed or permanently deleted if in electronic form when a project or matter closes. The respective departments shall gather and review all such temporary records and before destroying or deleting these documents make sure to have duplicates of all the final records pertaining to the project or matter.

Explanation: Temporary records include all business documents that are intended to be superseded by final or permanent records, or which are intended to be used only for a limited period of time, including, but not limited to written memoranda and dictation to be typed in the future, reminders, to-do lists, reports, drafts, and interoffice correspondence regarding a client or business transaction.

6. POLICY REVIEW

6.1 The 'Designated Officer' may review the Policy from time to time. Material Changes to the Policy will need the approval of the Board of Directors.

6.2 Should there be any inconsistency between the terms of the Policy and the Listing Regulations, or any other law(s) the provisions of the later shall prevail.



Annexure I

AN INDICATIVE LIST OF THE DOCUMENTS / REGISTER ALONG WITH TIME-FRAME OF THEIR PRESERVATION

A. PERMANENT PRESERVATION:

- (a) Common Seal
- (b) Minutes books of Board, General Meetings and Committee Meetings
- (c) Statutory Registers
- (d) License and Permissions
- (e) Statutory Forms and disclosures except for routine compliance
- (f) Scrutinizers' Reports
- (g) Register of Members
- (h) Index of Members

B. TEMPORARY PRESERVATION UPTO 8 YEARS:

- (a) Annual Returns
- (b) Board Agenda and supporting documents
- (c) Attendance Register
- (d) Office copies of Notice of General Meeting and related papers
- (e) Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- (f) All notices pertaining to disclosure of interest of directors
- (g) Instrument creating a charge or modification
- (h) Books of accounts, financial statements etc.
- (i) Register of debenture holders or any other security holders



C. OTHERS

As per applicable law

Annexure II

REGISTER OF DOCUMENTS DISPOSED / DISCARDED

S. No.	Brief Particulars of Document	Date and Mode of Destruction	Initials of the Authorised Person