

SARTHAK METALS LIMITED

(Formerly: Sarthak Metals Marketing Private Limited)

Policy for Preservation of Documents

Under Regulation 9 of the SEBI (Listing Obligations and Disclosures
Requirements) Regulation, 2015

For, SARTHAK METALS LIMITED


DIRECTOR

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1. PREAMBLE

This policy attempts to preserve and maintain documents of the organisation. During the course of business, the Company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organisation. In order to preserve such documents, the Company needs to implement a well-considered, well documented plan to ensure that they remain in good condition over a period of time. In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), the Board of Directors (the "Board") of Sarthak Metals Limited has adopted this Policy for Preservation of Documents, as required under applicable regulations. In any circumstances, where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

2. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- I. The documents of a permanent nature (listed in *Annexure I*) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.
- II. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in *Annexure II*) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

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

3. Definitions

"Company" means Sarthak Metals Limited (Formerly: Sarthak Metals Marketing Private Limited)

"Act" means the Companies Act, 2013

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"Applicable Law" means any laws, rules, circular, guidelines or standard issued by Securities Exchange Board of India, Ministry of Corporate Affairs and the Institute of Company Secretaries of India which have prescribed of the Documents.

"Authorised Person" means any person duly authorised by the Board.

"Board of Directors" or "Board" means the Board of Directors of Sarthak Metals Limited, as constituted from time to time.

"Compliance Officer" means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

"Documents" means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

"Document Keeping" means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

"Electronic Record(s)" means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.

"Electronic Form" means any contemporaneous electronic device such as Computer, Laptop, Compact Disc, Floppy Disc, Space on Electronic Cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

"Maintenance" means keeping Documents, either physically or in Electronic Form.

"Policy" means policy on Preservation of Documents.

"Preservation" is maintenance of documents, files and documents in usable form.

"Key Managerial Personnel" or "KMP" shall have the same meaning ascribed to it under the Act.

"Listing Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

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4. ROLES AND 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. CLASSIFICATION OF DOCUMENTS

The preservation of Documents shall be done in the following manner:

- I. Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- II. Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is "Current".
- III. In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance; Provided that generally speaking, a Document may be preserved for a period of 5 years from the date on which the Document was originated.

6. CUSTODY OF THE DOCUMENTS

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tender's resignation or is transferred from one location of the Company to another, such person shall hand over all the relevant documents, lock and key, access control or password, or Company Disc, other Storage devices or such other Documents and devices in his/her possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

S.no.	Documents	Authorised Person
1.	Tax / Accounting/ Financial Records	CFO/Accounts/Finance Head
2.	Minutes / Statutory Registers, Legal Documents / Contracts	Secretarial Cum Legal Head
3.	Employment / personnel Records	HR Head
4.	Electronic Mails	Individual respective sections

7. DESTRUCTION OF RECORDS/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.

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8. CONVERSION INTO ELECTRONIC FORM

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

9. AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

10. 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.

ANNEXURE I

Documents whose preservation shall be permanent in nature as per Companies Act, 2013

S.NO.	NATURE OF DOCUMENTS
1.	Agreement made by the Company with Stock Exchanges, Depositories, etc.
2.	Certificates of Incorporation
3.	Licenses & Statutory Approvals
4.	Statutory Registers required under applicable laws
5.	Memorandum and Article of Association as amended from time to time
6.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

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ANNEXURE II

Documents with preservation period of not less than eight years after completion of the relevant transactions as per Companies Act, 2013

Sr. No.	Nature of Document(s)
1.	Proxy Forms
2.	Representation letters
3.	Statutory registers maintain under the companies Act 2013
4.	Annual Reports
5.	Consent and Resignation Letters Received from the Director
6.	NSDL/ CDSL Files
7.	Annual Financial Statement including: - Annual Accounts - Director Reports - Auditor Reports
8.	Minute books
9.	Declaration by the Director under Section 164 of the companies Act 2013.
10.	Declaration by the Director under Section 184 of the companies Act 2013.
11.	All Documents under the listing Agreement
12.	Notice of General Meeting and Board Meeting
13.	Documents on which the common seal of the company has been affixed
14.	Central Government Approvals received
15.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

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