

SWASTIKA CASTAL LTD

PRESERVATION OF DOCUMENTS POLICY

LEGAL FRAMEWORK

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("Listing Regulations") and Companies Act, 2013 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 Swastika Castal Ltd ("Company") has formulated a policy for "Preservation of Documents" ("Policy") to comply with the requirements of Regulation 9 of the SEBI Listing Regulations and the applicable provisions of Companies Act, 2013.

SCOPE

This policy is intended to establish guidelines for the maintenance, management and orderly temperament of corporate records/documents. The Company recognizes that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

DEFINITIONS

"Documents" shall include all papers, notes, agreements, records, registers, books, files, tapes, CDs, DVDs etc. maintained either in physical or electronic form under the Companies Act, 2013 ("the Act"), Listing Regulations or any other law for the time being in force and applicable.

Any other term not defined herein shall have the same meaning as defined in the Act, Listing Regulations or any other applicable law, rules or regulations.

PRESERVATION OF DOCUMENTS

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

1. All documents specified in Annexure A to this Policy shall be preserved permanently including modifications, additions, deletions, etc. as per the provisions of the Act, Listing Regulations, Rules, Guidelines, Circulars, Notifications etc. issued from time to time.

Works / Factory

Block No. 535, Vemardi Road
Vill: Kandari, Tal: Karjan
Vadodara – 391210 India

CIN :U27101WB1996 PLC 079995
GSTIN :24AADCS9451P1ZR
EMAIL :scl@aluminiumcasting.net

Regd. Offi.:

117-A, Chittaranjan Avenue,
Koklata-700073.INDIA

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2. All documents specified in Annexure B to this Policy shall be preserved for a minimum period of 8 years after completion of the relevant transactions including modifications, additions, deletions, etc. as per the provisions of the Act, Listing Regulations, Rules, Guidelines, Circulars, Notifications etc. issued from time to time.

The documents which are not getting covered under either Annexure A or Annexure B shall be preserved as per the applicable provisions of the Act and / or Listing Regulations or other applicable laws.

These documents may be maintained by the Company in physical and / or electronic mode.

The Company has authorised its Registrar & Share Transfer Agent (hereinafter referred to as “RTA”) to maintain strict control on stationery including blank certificates, dividend/interest/redemption warrants. The RTA shall conduct physical verification on a periodic basis as prescribed by SEBI from time to time and share the reconciliation report with the Company. The RTA shall frame a policy on behalf of the Company and share the same with the Company including any amendments thereof.

ARCHIVAL OF DOCUMENTS

The Documents that are to be hosted on the website of the Company as per the Listing Regulations will be made available for a period of 5 years and thereafter, will be archived and maintained / preserved on the server for a period of 3 years. After expiry of this period, it will be permanently removed from the server.

DISPOSAL AND DESTRUCTION OF DOCUMENTS

The records/ documents preserved shall be reviewed every year or according to the need of the respective departments and actions taken to destroy those records, which are due for disposal wherever required, approval of Board will be taken for disposal of certain documents.

The documents which are not required to be maintained and preserved permanently may be destroyed with the approval of the Key Managerial Personnel (KMP) of the Company.

However, the documents which cannot be destroyed without the approval of the Board of Directors of the Company as per the provisions of the Act or Listing Regulations, a prior approval shall be taken for disposal of such documents.

The Company shall maintain a register of disposal of records in the custody of the Company Secretary and Compliance Officer of the Company, wherein the brief particulars of the records disposed of shall be entered.

The register of disposal of records shall contain the following columns:

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- a. Item Number;
- b. Brief Particulars of the records disposed of;
- c. Date of approval for disposal of records;
- d. Date of disposal; and e. Mode of destruction

This register of disposal of records shall be maintained permanently by the Company with the assistance of the Company Secretary and Compliance Officer either in physical or electronic form.

REVIEW

This Policy shall be reviewed by the Board of Directors as and when required or at least once in three years and updated accordingly.

LIMITATION AND AMENDMENTS

In the event of any conflict between the provisions of this Policy and the Companies Act, 2013 or Listing Regulations or any other statutory enactments or rules, the provisions of such Act or Listing Regulations or statutory enactments or rules shall prevail over this Policy.

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, such amendment(s), clarification(s), circular(s) etc. shall prevail upon the relevant provisions of the Policy and this Policy shall stand amended accordingly from the effective date of such amendment(s), clarification(s), circular(s) etc.

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Annexure A Documents which

are required to be preserved permanently:

1. Registration Certificates, licenses and other statutory approvals
2. Memorandum and Articles of Association
3. Minutes of board meetings, committee meetings and general meetings
4. Statutory Registers as per the Act
5. Agreements with the Stock Exchanges, Depositories and other authorities
6. Investment documents of subsidiaries and associates
7. Orders issued by Courts/ statutory bodies
8. Documents pertaining to real estate, title documents
9. Any other document as may be specified in the Act or Listing Regulations or other applicable laws
10. Books and documents relating to issue of share certificate, including blank forms of share certificates
11. Statutory Forms except for routine compliance
12. Scrutinizers Report

Annexure B

Documents which are required to be preserved for a minimum period of 8 years:

1. Books of accounts
2. Income tax returns and tax records
3. Agenda and other related papers shared with the Board of Directors
4. Disclosure of interests received from Directors and senior management
5. Annual returns
6. Correspondences with shareholders and / or statutory authorities
7. Other material contracts and / or agreements

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