



GALLANTT ISPAT LIMITED
(Formerly known as Gallantt Metal Limited)

**PRESERVATION OF DOCUMENTS
AND ARCHIVAL POLICY**

PREFACE

In compliance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), the Board of Directors ("Board") of Gallantt Ispat Limited ("Company") has approved the following Policy for Preservation of Documents ("Policy") for the Company.

The Policy shall be applicable on preservation of documents / records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as "Documents").

OBJECTIVE AND PURPOSE

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same.

ADMINISTRATION

Attached as **Appendix A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents.

The Chief Financial Officer, Head of the Departments who are responsible for relevant areas of the Company's operations ("Responsible Officers") shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed.

The Documents Preservation Schedule may be modified/supplemented from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

The Board shall also have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In the event of any contradiction in the Documents Preservation Schedule and the statutory provisions, the period provided for in the statutory provisions shall prevail.

MODES OF PRESERVATION

1. The Documents may be preserved in –
 - Physical form or
 - Electronic Form.
2. The officer of the Company required to preserve the Document shall be the Responsible Officer who is generally expected to observe the compliance of requirements of Applicable Law.
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. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the Responsible Officers with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

ADHERENCE OF THE POLICY BY THE EMPLOYEES

The Company expects from its Responsible Officers to understand and fully comply with this Policy and schedules, provided however that if it is believed, or the Company informs otherwise, that Company records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then the same be preserved until the Responsible Officers/Legal Department determines the records are no longer needed. That exception supersedes any previously or subsequently established destruction schedule for those records. If any employee believes that exception may apply, or have any question regarding the possible applicability of that exception, please contact the Responsible Officers/Legal Department.

Further, in the event that the Company is served with any legal or statutory notice for any Document(s) from any of the statutory authorities or any litigation / proceeding is commenced by or against the Company, then the disposal of documents which are subject

matter of such notice or litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed off.

The Responsible Officers/Legal Department shall immediately inform relevant employees of the Company for suspension of further disposal of Documents.

This Policy shall be posted on the website of the Company.

PROCEDURE FOR DISPOSAL OF DOCUMENTS

The Documents that are no longer required as per the time schedule prescribed in the Appendix A may be destroyed. The Responsible Officers may direct the relevant employees from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix A. 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 the Documents in the format prescribed at Appendix B.

CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED

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.

AUTHENTICITY

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

UNAUTHORISED RETENTION/ DESTRUCTION CAN LEAD TO CONSEQUENCES

Employees are made aware that premature destruction of records is expressly prohibited, and if intentional, may result in disciplinary action, up to and including termination of employment and possible civil or criminal liability.

Under no circumstance should duplicates or drafts (unofficial records) be retained longer than the official versions of the records. When records are approved for destruction, all copies in the possession of employees in all media and formats must also be discarded.

AUDIT

Internal Audit team will review and ensure comprehensiveness of documents covered and adherence to the policy at least once a year.

Policy revised w.e.f. 01.04.2023

APPENDIX A

Documents Preservation Schedule:

Sr. No.	Document Type	Preservation Period (in Yrs.)
1.	Common Seal, Certificate of incorporation, Certificate of change of name (if any), Memorandum and Articles of Association as amended from time to time, Counter folios of Share Certificates issued from time to time	Permanent
2.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3.	Statutory Registers	Permanent
4.	License and Permissions	Permanent
5.	Statutory Forms except for routine compliance	Permanent
6.	Scrutinizer's Report	Permanent
7.	Register of Members	Permanent
8.	Index of Members	Permanent
9.	Annual Returns	8
10.	Board Agenda and supporting documents	8
11.	Attendance Register	8
12.	Office copies of Notice of General Meeting and related papers	8
13.	Office copies of Notice of Board Meeting/Committee Meeting, Agenda, Notes on Agenda and other related papers	8
14.	Books of Accounts	8
15.	Register of Debenture-holders, if any	15 years after the redemption of debentures
16.	Index of debenture-holders, if any	15 years after the redemption of debentures

B: All other documents

All other documents of the Company shall be maintained in compliance with the requirements of the applicable laws.

APPENDIX B

Register of Documents disposed/destroyed:

Sr. No.	Particulars of documents destroyed	Date and mode of destruction	Initials of the Responsible Officer