

**HAPPY STEELS LIMITED**  
**POLICY ON**  
**PRESERVATION OF DOCUMENTS**

## **PRESERVATION OF DOCUMENTS POLICY**

### **1. PREAMBLE**

The purpose of this Policy is to establish a framework for 'Preservation of Documents' consistent with the regulatory requirements. The process of evaluating the business activities includes determination of documents and other information that are required to be captured and preserved in order to meet business needs, organizational requirements and stakeholders expectations.

We, at Happy Steels Limited, believe that efficient record keeping is fundamental for effective information system that support good and transparent governance culture.

Guided by the principles laid down in terms of Regulation 9 of the Securities and Exchange Board of India (Listing and Disclosure Requirements) Regulations, 2015, the Company is required to formulate a 'Policy for Preservations of Documents.'

In terms of Regulation 30(8) of the (Listing and Disclosure Requirements) Regulations, 2015, the company is required to formulate '**ARCHIVAL POLICY**' for all the Disclosures of events/Information to the Stock Exchanges in terms of the Company's Policy for Disclosure of Events/ Information and Determination of Materiality.

### **2. DEFINITIONS:**

**'Act'** means the Companies Act, 2013 including any amendment or modification thereof.

**'Applicable Law'** means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, the Ministry of Corporate Affairs and the Institute of Company Secretaries of India under which the preservation of documents has been prescribed.

**'Authorized Person'** means any person duly authorized by the Board.

**'Archive'** is an accumulation of historical records or the physical place/electronic mode where they are located. Archives contain primary source of documents that have accumulated over the course of an organization's lifetime, and are kept to show the function of that organization

**'Board of Directors' or 'Board'** means the Board of Directors of Happy Steels Limited

**Company'** means Happy Steels Limited.

**Current Documents'** means any document that still has an ongoing relevance with reference to an ongoing litigation, proceedings, compliant dispute, contract or any like matter,

**'Committee'** means the Committee of the Board of Directors or any other committee so constituted.

**Compliance Officer'** means Company Secretary of the Company

**'Documents'** means papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other

record required under or in order to comply with the requirements of any applicable laws whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

**"Evidence'** means information that tends to prove a fact.

**Electronic Records'** means the electronic records as defined under Section 2(1)(t) 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.

**'Financial Year'** shall have the same meaning as assigned under Section 2(41) of the Companies Act 2013.

**'Maintenance'** means keeping documents and records, either in physical or electronic form

**"Preservation'** means maintenance of documents, files and documents in usable form

All other words and expressions not defined herein, but defined in the Companies Act 2013, Securities Contracts (Regulation) Act 1956, the Depositories Act 1996 and/or rules and regulations made thereunder, shall have the same meaning as respectively assigned to them in such Acts or rules or regulations' or any statutory modification or re-enactment thereto, as the case may be.

### **3. POLICY FOR PRESERVATION OF DOCUMENTS**

Documents of the Company shall be preserved (whether in electronic form or in physical form or both) as below:

#### **A. Following Documents shall be preserved permanently:**

1. All licenses, permissions, orders or certificates of perpetual nature.
2. Minutes of Board Meetings, Committees Meetings and Shareholders Meetings.
3. Documents as required by the prevailing laws to be preserved permanently, and
4. Documents as may be decided by the management of the Company to be preserved permanently.

#### **B. For Specific Period**

Certain documents {other than those stated in the above paragraph (A)} shall be preserved for specific period as may be prescribed in prevailing laws applicable to the Company.

#### **C. For the period less than 8 years**

Certain documents {other than those stated in the above in the above paragraphs (A) & (B)} shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions unless otherwise decided by the Management of the Company.

### **4. POLICY ON ARCHIVAL OF INFORMATION**

The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under the Regulation 30 of the Securities and Exchange Board of India (Listing and Disclosure Requirements) Regulations, 2015, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five (5) years and thereafter shall be placed in an Archival.

### **5. ROLES AND RESPONSIBILITY OF VARIOUS DEPARTMENTAL HEADS**

The departmental heads must be familiar with this policy and educate their department in this regard. They must restrict access to confidential records and information. They must coordinate in the destruction of the records as and when required.

## 6. AMENDMENTS AND MODIFICATION IN THE POLICY

The Board may, subject to applicable laws, amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the policy entirely with a new policy as it may deem necessary.

The Board may also establish further rules and procedures, from time to time, to give effect to this policy and to ensure governance.

Deepak Garg  
Director  
For HAPPY STEELS LIMITED

For HAPPY STEELS LIMITED  
Abhishek Garg  
Managing Director  
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