

Shivalik Bimetal Controls Limited

Maintenance and Preservation of Documents and Archival Policy

1. PREFACE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [“SEBI (LODR)’’], the provisions of other applicable laws, Rules and Regulations made thereunder, requires every listed company to form a policy for preservation of its documents, approved by its Board of Directors, classifying them in at least two categories as follows: (a) Documents whose preservation shall be permanent in nature; and (b) Documents with preservation period of not less than eight years after completion of the relevant transactions. The Company may keep documents specified in clauses (a) and (b) above in physical / electronic mode.

2. GOVERNING LAWS

This policy shall be governed by the provisions of the Companies Act 2013, SEBI Act & Rules and Regulations made thereunder, Secretarial Standards issued by the Institute of Company Secretaries of India, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

3. SCOPE

This policy is applicable to all units/ departments of the Company.

4. PURPOSE

This Policy deals with the preservation of the corporate records of Shivalik Bimetal Controls Limited (hereinafter, referred to as “the Company”). It seeks to ensure that the Company’s business is adequately documented and is managed in accordance with best practices. This Policy emphasizes on the importance of preservation of the records and disclosures hosted on the website of the Company for making information accessible to all stakeholders for taking well-informed decisions. It also aims at promoting transparency, accountability and relationship with stakeholders. All employees are expected to fully comply with this policy.

5. TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The Company shall maintain and preserve documents as specified hereunder:

Category (A): The documents of permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

Category (B): The documents of the Company to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure-2) shall be preserved by the Company for the term not less than eight year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

For the purpose of this Policy, document may include the following:

- i. 'books and papers' as defined in clause 12 of section 2 of the Companies Act, 2013;
- ii. 'books of accounts' as defined in clause 13 of section 2 of the Companies Act, 2013;
- iii. 'documents' as defined in clause 36 of section 2 of the Companies Act, 2013;
- iv. 'registers' as defined in clause 74 of section 2 of the Companies Act, 2013

Further, the Company may deeming fit and possible from time to time maintain above mentioned documents in electronic form to the extent possible.

4. ROLES & RESPONSIBILITIES

The respective departmental heads of the Company shall be responsible for maintenance and preservation of the Documents in terms of this Policy and to report thereon to the Audit Committee periodically. The Audit Committee of the Company shall periodically review report(s) from head of departments and decide the category for preservation of documents.

The Compliance Officer of the Company (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule (as per Annexure 1 & Annexure 2) is followed.

5. AMENDMENT

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall 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.

6. COMMUNICATION

For all new employees and directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing employees and directors, a copy of this Policy shall be handed over within one month of the adoption of this

Policy by the Board of Directors of the Company. This Policy shall also be posted on the website of the Company.

7. Archiving of Documents which are hosted on the Company's website

The Company is required to disseminate and host the information and documents on its website under various provisions of the Listing Regulations, Companies Act, 2013 and other applicable laws. The Company is also required to frame an Archival Policy to shift such information and documents in Archives. The list of information and documents to be disseminated by the Company on its website along with the period of hosting and archiving has been set out at **Annexure-3**

Annexure 1
Documents whose preservation shall be permanent in nature

S. No	Nature of Documents
1	All documents and information originally filed with ROC for Incorporation of Company
2	Memorandum of Association and Articles of Association as originally filed and updated from time to time
3	Register of Members
4	Register of Foreign Members
5	Index of Members
6	Minutes of General Meeting
7	Minutes of Board Meeting
8	Minutes of various Committee Meetings
9	Any other document or register as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

Annexure 2

Documents with preservation period of not less than eight years after the completion of the relevant transactions

S. No	Nature of Documents
1	Books of Accounts, Ledgers and Vouchers
2	Annual Audit Reports and Financial Statements
3	Annual Return(s)
4	Register of Debenture holders, if any
5	Index of Debenture holders, if any
6	Register of Foreign Members
7	Any other document or register as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

Annexure 3

Time period for disclosure of information and documents on Company's website and thereafter in Archives.

S. No	Nature of Information /document	To be hosted on the website	In Archives
1	Details of its business Permanently	Permanently, to be updated from time to time.	-
2	Terms and conditions of appointment of independent director(s)	Up to tenure of the Independent director	To be kept for no. of years of appointment
3	Composition of various committees of board of directors	Permanently, to be updated from time to time.	
4	Code of conduct of board of directors and senior management personnel	Permanently, to be updated from time to time.	
5	Details of establishment of vigil mechanism/ Whistle Blower policy	Permanently, to be updated from time to time.	
6	Policy on dealing with party transactions related	Permanently, to be updated from time to time.	
7	Policy for determining 'material' subsidiaries	Permanently, to be updated from time to time, as and when applicable	
8	The email address for grievance redressal and other relevant details	Permanently, to be updated from time to time.	
9	Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor	Permanently, to be updated from time to time.	
10.	Financial Information including:		
	(i) notice of meeting of the board of directors where financial results shall be discussed	1 year	To be kept for in archive for 1 year
	(ii) financial results, on conclusion of the meeting of the board of directors	5 year	To be kept for in archive for 1 year

Note: This policy was reviewed and revised by the Board of Directors of the Company at its meeting held on February 12th, 2025.

	where the financial results were approved		
	(iii) complete copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report etc.	5 year	To be kept for in archive for 3 year
11	Shareholding pattern	3 years	To be kept for in archive for 2 year
12	Details of agreements entered into with the media companies and/or their associates, etc.	For life time of the agreement	To be kept for in archive for 2 year
13	Schedule of analyst or institutional investor meet and presentations (including the audio and transcript) made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange	5 years	To be kept for in archive for 1 year
14	New name and the old name of the listed entity for a continuous period of one year, from the date of the last name change	1 years	To be kept for in archive for 1 year
15	Copies of advertisements published in Newspapers:		
	(a) notice of meeting of the board of directors where financial results shall be discussed	1 years	To be kept for in archive for 1 year
	(b) financial results, as specified in regulation 33, along-with the modified opinion(s) or reservation(s), if any, expressed by the auditor.	1 years	To be kept for in archive for 1 year
	(c) statements of deviation(s) or variation(s) as specified in sub regulation (1) of regulation 32 on quarterly basis, after review by audit committee and its explanation in directors report in annual report	1 years	To be kept for in archive for 1 year
	(d) notices given to shareholders by advertisement.	1 years	To be kept for in archive for 1 year

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16	Disclosures made on the website of all such events or information which has been disclosed to the stock exchanges under Regulation 30 of the Listing Regulations	5 years	To be kept for in archive for 1 year
17	Other information or documents as may be prescribed / amended under applicable Laws or by Authorised person	Permanent or for such time period as may be prescribed there under	To be kept for in archive for 1 year

Note: This policy was reviewed and revised by the Board of Directors of the Company at its meeting held on February 12th, 2025.