



OCL IRON AND STEEL LIMITED

DOCUMENT RETENTION & ARCHIVAL POLICY



INTRODUCTION

The Board of Directors (the “Board”) of **OCL Iron and Steel Limited** (the “Company”) has adopted the following policy and procedures with regard to the retention and archival of the corporate records.

This Policy will be applicable to the Company effective 1 December 2015. This Policy is in terms of Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

1. POLICY OBJECTIVE

This Policy deals with the retention and archival of the corporate records of **OCL Iron and Steel Limited** and all its subsidiaries (hereafter, referred as the “Company”).

2. DEFINITIONS

“**Board of Director**” or “**Board**” means the Board of Directors of OCL Iron and Steel Limited, as constituted from time to time.

“**Policy**” means Document Retention & Archival Policy.

“**Corporate records**” mean all paper or electronic records that are produced by an employee, including but not limited to, memoranda, contracts, agreements, e-mails and expense records.

3. POLICY

The Company is required to maintain certain types of corporate records for a specified period of time. Failure to do so could subject the Company and its employees to serious legal consequences.

All employees are expected to fully comply with this policy. Failure to comply with this policy may result in strict disciplinary action against the employee.

Generally, all corporate records (whether electronic or paper) of the Company are to be retained for not less than three (3) years, and may be destroyed thereafter.

If an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records needs to be preserved until the Legal Department advises otherwise.



Additionally, there are certain types of records that need to be retained for a longer period of time, as identified below:

- a) **Board of Directors Records:** Minutes of meetings of the Board of Directors shall be maintained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for not less than three (3) years.
- b) **Press Releases & Public Filings:** All press releases and publicly filed documents shall be maintained in perpetuity. All events and press releases filed with the stock exchanges shall be maintained for not less than five (5) years on the website of the company.
- c) **Books of Accounts and Tax Records:** Books of accounts and Tax records should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used.
- d) **Employment Records:** The Company maintains personnel records that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment, such as actions taken against personnel. These records should be retained for a period of three (3) years following the cessation of employment.
- e) **Intellectual Property Records:** Document relating to the development and protection of the intellectual property rights should be maintained for the life of such intellectual property right.
- f) **Contracts & Agreements:** Executed copies of all Contracts & Agreements entered into by the Company should be retained for at least three (3) years following the expiry or termination of the contracts.

The Company maintains safety procedure to ensure proper maintenance of all documents and records. In the event of any accident incident, immediate action plan to rescue or prevent further damage to the records is defined. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Company has made appropriate provision for the backup of its digital collections, including the provisions of offsite security copies. The backup copies are actively maintained to ensure their continued viability.

In case of doubts and for any clarification regarding the Policy, the Legal Department/Compliance Officer may be consulted.



4. REVIEW & DISSEMINATION OF POLICY

The policy should be reviewed periodically by the senior management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The senior Management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.

The policy shall be uploaded on the website of the Company.

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