

The logo watermark is a large, light blue circular emblem. Inside the circle, there is a stylized red 'V' shape. At the top of the 'V', there is a red 'S' shape. The text 'VIBHOR STEEL TUBES LIMITED' is written in bold red capital letters across the middle of the emblem.

VIBHOR STEEL TUBES LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

1. PREFACE

In terms of Regulation 9 of Listing (Obligations and Disclosures Requirements) Regulations, 2015 ("Regulations"), as mentioned below, the Company is required to frame a policy for preservation of documents:

"The listed entity shall have a policy for preservation of 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;

(b) Documents with preservation period of not less than eight years after completion of the relevant transactions;

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode"

In this context the policy on preservation of documents has been framed.

2. PURPOSE

This policy has been framed to abide by the Regulation 9 of Listing (Obligations and Disclosures Requirements) Regulations, 2015 (herein after referred as "the Regulations")

3. DEFINITIONS

- a) **Act:** means the Companies Act, 2013 including any amendment or modification thereof.
- b) **Board:** Board means Board of Directors of the Company.
- c) **Company:** means ***Vibhor Steel Tubes Limited***.
- d) **Compliance Officer:** "Compliance Officer" means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- e) **Document:** "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- f) **Employees:** "Employees" shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.

- g) **Key Managerial Personnel:** “Key Managerial Personnel” shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed thereunder.
- h) **Regulations:** “Regulations” shall mean SEBI [Listing Obligations and Disclosure Requirements) Regulations, 2015.

Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

4. RESPONSIBILITY

The Heads of respective Departments of the Company shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.

5. POLICY REVIEW

The policy will be reviewed periodically by the Top Management of the company and amendments will be effected to subject to approval of the Board if and when practical difficulties are encountered. The Top management may also review this policy on document preservation considering compliance requirements under any local, state, central legislation that may be formulated from time to time.

6. PRESERVATION OF DOCUMENTS

(i) CATEGORY A – DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

The following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- (a) Registration Certificates
- (b) Statutory Registers required under applicable laws
- (c) Polices, Charters and Codes of the Company
- (d) Minutes of the Board Meetings and Board Committees as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- (e) Minutes of General Meetings (including AGMs) as prescribed by the “Secretarial Standard-2

on General Meetings” issued by the Institute of Company Secretaries of India.

- (f) Register of directors and Key Managerial Personnel.
 - (g) Register of Renewed and Duplicate Share Certificates
 - (h) Register of Charges
 - (i) Register of Members along with the index (Form MGT-1)
 - (j) Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities) Form MBP-2.
 - (k) Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person) Form MBP-3.
 - (l) Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)
 - (m) Property Card, Ownership, records issued by government Authority
 - (n) The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company
 - (o) Material agreements/ contracts, which, even if terminated, may have an impact on business.
 - (p) Orders/ judgement issued by Courts/statutory bodies and other background documents relevant for understanding such Orders
 - (q) Any other document, certificates, statutory registers that may be required to be preserved permanently in terms of the Companies Act, 2013 and/ or SEBI Regulations.
- (ii) CATEGORY B – DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION.**

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

- (a) Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.
- (b) Books of Accounts

- (c) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013;
- (d) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- (e) Disclosure of interest received from directors of the Company in the manner prescribed.
- (f) Instrument creating a charge or modifying a charge.
- (g) Changes to the Memorandum and Articles of Association.
- (h) Employment record for the employees of the Company.
- (i) Office Copies of Notices, Scrutinizer’s Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India.
- (j) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- (k) Documents as are required to be maintained under relevant laws relating to direct and in-direct taxes.
- (l) Marketing documents.
- (m) Press releases.
- (n) Legal documents including but not limited to contracts, legal opinions, orders passed by various courts and tribunals, documents relating to cases pending in any court, tribunal or authority.
- (o) Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act, 2013 and/or SEBI Regulations.

(iii) CATEGORY C – GENERAL

In addition to the documents mentioned in Category ‘A’ and ‘B’ above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily

maintained and preserved shall be preserved for a stipulated period of time as per the existing Rules/ Procedures/ Practices of the Company or as per the applicable Statutory/ Regulatory provisions in this regard.

7. DESTRUCTION OF RECORDS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/ concerned Functional Director/ Head of the Department. This applies to both physical and electronic documents.

8. SUSPENSION OF RECORD DISPOSAL

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise.

9. AUTHORITY FOR APPROVAL OF POLICY

The Board shall have the authority for approval of this policy in pursuance to this Regulation.

10. AUTHORITY TO MAKE ALTERATIONS TO THE POLICY

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

11. EFFECTIVE DATE

The policy will be effective with effect from the date of approval by the Board.

12. DISCLAIMER

Nothing contained in this Policy shall operate in derogation of any law for the time being in force or of any other regulation in force.

In any circumstance where the terms of this Policy differ from any applicable law governing the Company, such applicable law will take precedence over this Policy and procedures until such time as this Policy is modified in conformity with the Applicable Law.

For VIBHOR STEEL TUBES LIMITED

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