

## **HARIYANA SHIP-BREAKERS LIMITED POLICY ON PRESERVATION OF DOCUMENTS**

### **1. Preamble:**

The Company recognizes that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication. Corporate records are valued as Corporate Assets and include all records which may be in physical or in electronic form.

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), mandates listed entities to formulate a Policy for Preservation of Documents. This policy identifies documents/ records that need to be maintained and contain guidelines for how long certain documents should be kept and how they should be destroyed.

Accordingly, the Board of Directors of Hariyana Ship-Breakers Limited ("the Company") has adopted the Policy for Preservation of Documents.

### **2. Objective:**

Regulation 9 of the Listing Regulations requires the Companies to have in place a policy for preservation of documents approved by its Board of Directors, classifying the documents in at least two categories, which are as follows:

- Documents whose preservation shall be permanent in nature;
- Documents with preservation period of not less than eight years after completion of the relevant transactions.

The objectives of easy and expeditious retrieval of information support during litigation/ investigation and non-storage of unwanted documents/records can also be served. The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained

### **3. Scope:**

These guidelines will be valid for determining preservation period for commercial and legal records and will be applicable to all locations of the Company.

### **4. Mode of Preservation:**

The documents/ records of the Company may be preserved either physically or in electronic form.

## 5. Period of Preservation:

The records need to be maintained either in physical or in electronic form (as permitted by relevant governing laws/ rules/ regulations), for such periods as may be prescribed from time to time by various Regulatory Authorities. The details of same are given below:

Type of Document / Record	Minimum preservation period
Minutes book, statutory registers and licenses/ certificates issued by the regulatory/ governing authorities	Permanent
Records/ documents required to be maintained as per statutory requirements.	As prescribed by the relevant statutes/ rules/ regulations / internal policies or 8 years, whichever is higher.
Records/ documents having higher reference value and contractual/ legal implications.	8 years after completion of the relevant transactions.
Records which can be cited or required to be produced as evidence in judicial or quasi-judicial or other dispute redressal forum	8 years after the matters are finally disposed of.

## 6. Destruction of Documents:

The documents/ records preserved shall be reviewed by the respective department and those which are due for disposal, respective department may take appropriate action to destroy the same. The authorization to destroy such documents/ records must be given by the Head of the Department. For documents/ records preserved in physical form, shredders may be used while destroying copies of any sensitive or confidential document. For documents/ records in electronic form, appropriate techniques must be used so the data cannot be reconstructed/ retrieved from the storage media on which it resided.

## 7. Review & Amendment:

The Policy shall be reviewed on a periodic basis. The Chief Executive Officer & Managing Director and any one of the Chief Financial Officer or Company Secretary or any other person as may be decided by Chief Executive Officer & Managing Director from time to time have the right to make such changes as may be deemed necessary or as warranted by law.

## 8. Dissemination of the Policy:

The approved Policy shall be uploaded on the Company's website, <http://www.hariyanagroup.com/>

## 9. Applicability:

In the event, any provisions contained in this Policy is inconsistent with existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy.