



BHAGWATI AUTOCAST LIMITED

**POLICY ON PRESERVATION OF DOCUMENTS
AND
ARCHIVAL POLICY**

(effective from 1st December, 2015)

Policy on Preservation of Documents and Archival Policy

Bhagwati Autocast Limited

[Under Regulation 9 & 30 of the SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015]

1. PREMBLE :

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), BHAGWATI AUTOCAST LIMITED (the Company) is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations in at least two categories as specified in the said Regulation.

In terms of Regulation 30(8) of the Listing Regulations, the Company is required to formulate an archival policy for all disclosures of events/information to the Stock Exchanges in terms of the Company's Policy for Disclosure of Events/Information and Determining of Materiality.

2. PURPOSE:

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under the Listing Regulations, in terms of Regulation 9 and also to archive any of the material of events or information which are disclosed by the Company to the Stock Exchanges prior to the period of five years in terms of Regulation 30.

The provisions of this Code can be amended/ modified by the Board of Directors of the Company from time to time and all such amendments/ modifications shall take effect from the date stated therein.

3. POLICY FOR PRESERVATION OF DOCUMENTS:

1. Documents and Records of the Company required to be maintained under the Listing Regulations shall be classified in two categories as below :
 - a. Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;

- b. Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions the subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.
2. The listing documents and records in physical form shall be in the custody of the Company Secretary.
3. The Company may keep the listing documents and records as specified above in electronic mode.
4. The Registrar and Share Transfer Agent shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained by them and provide an annual undertaking to the Company in this regard.

4. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS:

The Company Secretary and in absence thereof the Key Managerial Personal appointed by the Board of directors of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

5. AUTHORIZED FOR MONITORING THE POLICY:

The Company Secretary or anyone of Key Managerial Personnel of the Company authorized by Board of Directors shall be responsible for monitoring the Policy. The authorized person shall inform its Board of Directors about the monitoring of the Policy. The authorized person shall take necessary step to discharge his duty.

6. SECURITY OF DOCUMENTS:

The Board shall ensure that all the documents shall keep in safe place in the Company premises. The Company Secretary is authorized person for the security of documents, who shall be responsible for safe custody of documents.

7. ARCHIVAL POLICY:

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on

the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years.

8. DISPOSAL OF DOCUMENTS:

Disposal of documents after said period of 8 years (whose preservation shall not be permanent in nature) shall be done in the presence of Authorized person in method prescribed by Board of Directors. Before disposing a soft copy shall be taken for the record.

9. REVIEW OF THE POLICY:

The board of directors of the company shall review the policy on annual basis. The authorized person shall provide regular assurance to board of directors on the effectiveness of the Policy.

10. DISCLOSURE/AMENDMENT:

This policy as amended from time to time shall be made available at the website of the Company. The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.