



POLICY ON PRESERVATION OF THE DOCUMENTS

OF

LLOYDS METALS AND ENERGY LIMITED

(CIN: L40300MH1977PLC019594)

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**The Policy as approved by the Board of Directors shall be effective
from March 16, 2023**

Base Document: Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”)

1. SCOPE

A policy on preservation of Documents (defined below) would ensure safe-keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

2. DEFINITIONS

2.1. "**Act**" means the Companies Act, 2013.

2.2. "**Applicable Law**" means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

2.3. "**Authorized Person**" means any person duly authorized by the Board.

2.4. "**Board**" means the Board of directors of the Company or its Committee.

2.5. "**Company**" means **Lloyds Metals and Energy Limited**.

2.6. "**Current Document(s)**" means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

2.7. "**Document(s)**" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

2.8. "**Electronic Record(s)**" means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

2.9. “Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

2.10. “Maintenance” means keeping Documents, either physically or in Electronic Form.

2.11. “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

2.12. “Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this policy and not defined here shall derive their meaning from the Applicable law.

3. OBJECTIVE

It is intended to provide the systematic evaluation, preservation, and disposal of documents obtained or produced throughout corporate operations.

4. APPLICABILITY

This Policy is applicable to the Company and all corporate/business operations of the Company.

5. COVERAGE

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

6. SCOPE AND LIMITATIONS

In the event of any conflict between the provisions of this Policy and the Regulations or any other statutory enactments, the statutory enactments shall prevail over this Policy.

7. CLASSIFICATION

The preservation of Documents shall be done in the following manner:

- a. Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- b. Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is "Current".
- c. In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance; provided that generally speaking, a document may be preserved for a period of 5 years from the date on which the Document was originated.

An indicative list of the Documents and the timeframe of their preservation is provided in Annexure - I

8. MODES OF PRESERVATION:

- a. The documents may be preserved in
 - Physical form or
 - Electronic Form

An index of documents preserved (in the chronological order as per date) should be maintained by the Authorized Person (as per format at Annexure – IV)

- b. The officer of the Company required to preserve the Document shall be Authorized Person who is generally expected to observe the compliance of requirements of Applicable Law.
- c. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- d. The preserved Documents must be accessible at all reasonable times. Access may be controlled by authorized person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

9. CUSTODY OF THE DOCUMENTS

Subject to the Applicable Law, the custody of the Documents shall be with the Authorized Person. Where the Authorized Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the

relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorize such other person as it may deem fit as the Authorized Person.

10. RETENTION AND ARCHIVAL OF DOCUMENTS HOSTED ON COMPANY'S WEBSITE

The Company's website shall host the documents, information, and events revealed therein in accordance with the Regulations and any other applicable law or regulation from time to time. These records will then be archived to the Company's server and kept there for whatever additional time is necessary to comply with any applicable laws or regulations.

11. DESTRUCTION OF DOCUMENTS

- a. Destruction as a normal administrative practice usually occurs because the records are duplicated, Unimportant or for short-term use only. This applies to both Physical and Electronic Documents.
- b. The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice are listed in Annexure II
- c. A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.
- d. The entries in the register shall be authenticated by the Authorized Person.

The format of the register has to be in accordance with Annexure III.

12. CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED.

- a. The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- b. This will be done after obtaining prior approval of the Board.

13. AUTHENTICITY

Where a Document is being maintained both in physical form and in electronic form, the authenticity with reference to the physical form should be considered for every purpose.

14. INTERPRETATION

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation, or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

15. POLICY AMENDMENTS AND UPDATES

The Board shall review this Policy, replace any provision with a new provision, or completely replace this Policy with a new Policy. The Board shall evaluate this Policy on a regular basis. To achieve the goal of sound corporate governance and give effect to this Policy's aim, the Board may occasionally create additional rules and procedures.

This Policy in whole or in part, shall stand modified / amended from time-to-time, without any further act on the part of the Company, as and when there would be any statutory modification(s) / amendment(s) / revision(s) to the applicable provisions thereto.

Annexure- I

Documents whose preservation shall be permanent in Physical/Electronic Mode

1. The memorandum and articles of the company.
2. Shareholding Pattern.
3. Annual and Quarterly Financial Results.
4. Annual Report
5. Shareholding Pattern in case of Capital Restructuring.
6. Voting results by Shareholders.
7. Quarterly disclosures to the Stock Exchanges.
8. Yearly disclosure of shareholding of Promoters.
9. Minutes of General meetings/Board meeting/Committee Meetings.
10. Register of Charges.
11. Register & Index of Members.
12. Register of renewed and duplicate share certificates.
13. Register of Contracts in which Directors are Interested.
14. Register of Directors, Managing Director, Manager & Company Secretary.
15. Register of inter-corporate deposits, loans and investments.
16. Register of deposits.
17. Register of Payment of Dividend.
18. Register of Director's attendance.

Preservation of documents for 8 years in physical/Electronic Mode

19. Statement under Grievance Redressal Mechanism.
20. Corporate Governance Report.
21. Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI.
22. Compliance certificate w.r.t. Transfer or Transmission or transposition of Securities within 30 days.
23. Listing fees.
24. In-principle approval prior to issue of securities.
25. Prior intimations of Board meeting for financial results.
26. Disclosure of Price Sensitive Information.
27. Shareholding Pattern prior to listing of securities.
28. Record date for declaring dividend and /or bonus.
29. Disclosure of Events or Information.
30. Disclosures under code of Internal Procedures and Conduct for regulating, Monitoring and Reporting of Trading by Insiders.

31. Register of Charges.
32. Register of debenture holders or any other security holders.
33. Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and documents required to be annexed thereto.
34. All notices pertaining to disclosure of interest of directors.
35. Office copies of Notices scrutinizer's report and related papers.

Preservation of documents for 8 years in physical/Electronic Mode

36. All the information /disclosures of material events as disclosed by the Company to the Stock Exchanges under Regulation 30 of (SEBI Listing regulations).

Annexure – II

The following categories of Documents may be destroyed as normal administrative practice

1. Catalogues;
2. Copies of press cuttings, press statements or publicity material;
3. Letters of appreciation or sympathy, or anonymous letters;
4. Requests for copies of maps, plans, charts, advertising material (subject to Clause 9 and 10 of this Policy);
5. Facsimiles where a photocopy has been made;
6. Telephone message;
7. Drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 9 and 10 of this Policy); and
8. Routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 9 and 10 of this Policy).
9. Any other miscellaneous document deemed by the Management of low to no importance grade for future

Annexure - III

The format of the register of Documents disposed/destroyed –

<u>Particulars of document along with provision of applicable</u>	<u>Date and mode of destruction</u>	<u>Initials of the authorised person</u>
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<u>law</u>		

Annexure – IV

Index of documents to be reserved.

<u>Date</u>	<u>Particulars</u>	<u>8 years</u>	<u>5 years</u>	<u>Physical/Electronic Mode</u>	<u>Place/Source</u>