

1. Preface:

The policy is intended to define Sintercom's preservation of documents responsibilities and to provide guidance to the executives and staff working in Sintercom in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frames the guidelines for fundamental accountability of Sintercom to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. Objective:

The Company makes this Policy for Archival, Preservation and Disposal of Documents in compliance with the provisions of Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations) with the main objective to establish guidelines for the Company for preservation and archival of documents and orderly disposal of documents of the Company covered under this Policy.

3. Definitions:

"Act" shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

"Board of Directors" or "Board" means the Board of Directors of the Company.

"Company" means Sintercom India Limited.

"Document" means any register, record or other document mandatorily required to be maintained by the Company as per the provisions of the Companies Act, 2013 and the rules made thereunder, the Securities and Exchange Board of India Act, 1992 and the regulations issued by the Securities and Exchange Board of India including any statutory modification and amendments or re-enactments thereof or under any other law for the time being in force whether maintained physically or electronically.

"Listing agreement" shall mean the uniform listing agreement executed in pursuant to Securities and Exchange Board (Listing Obligations and Disclosure Requirements) Regulations, 2015

“Policy” means this Policy for Archive, Preservation and Disposal of Documents.

“Regulations” mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

“SEBI” means the Securities and Exchange Board of India.

“SEBI Regulations” means the regulations made by SEBI in accordance with the Securities and Exchange Board of India Act, 1992 (the SEBI Act).

Any other term not defined under these presents shall have the same meaning as defined in the Companies Act, 2013 or the rules made thereunder, the SEBI Act or the SEBI Regulations.

4. Applicability:

This policy shall apply to all the documents that are required to be maintained and preserved under the applicable provisions of the Act, the SEBI Act, the SEBI Regulations and any other acts, rules and regulation for the time being in force.

5. Periodicity of preservation of Documents:

The below guidelines shall be followed for proper preservation of documents:

Document Category	Document type	Preservation period	Mode of preservation
Company Operations	<ul style="list-style-type: none">• Memorandum/ Articles of Association• Certificate of incorporation• Licenses, certificates, approvals and other such documents issued by Central/State Government and any other statutory and/or regulatory body• Orders, judgements of judicial authorities• Policies, Charters and Codes of the Company• Other related Documents	Permanent	Physical and/ or electronically
Tax and Finance records	<ul style="list-style-type: none">• Books of accounts, including inter-alia, financial statements, vouchers relevant to entry in books of accounts, audit	Eight financial years or such period as may be specified	Physical and/ or electronically

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	<p>records, invoices, expense records, bank records etc. in accordance with the applicable provisions of Companies Act, 2013, Income tax Act, and any other applicable laws.</p> <ul style="list-style-type: none"> • Application/correspondence with various Direct and Indirect tax authorities • Excise invoices / bills / challans • Returns and Assessment Records • Sales Tax documents • All copies of registrations • Loan related Documents • Agreements pertaining to securities • Documents related to all other taxes and duties • Other related Documents 	<p>under applicable law/statute etc.</p>	
<p>Secretarial records</p>	<p>Notice, agenda and notes to agenda of meetings of the Board and its Committees</p> <ul style="list-style-type: none"> • Minutes of the meetings of the Board of Directors and of its committees • Minutes of all meetings of shareholders Office copies of Notices, scrutinizer's report and other documents related to meetings of shareholders/creditors of the Company • Attendance registers of the meetings of the Board and its Committees • Statutory Registers, indices, returns, forms as required under various applicable laws / statutes / regulations etc. • Statutory filings with the Stock Exchanges, SEBI, Ministry of Corporate Affairs, Reserve Bank of India and any other statutory/ regulatory authority 	<p>Permanent</p>	<p>Physical and/ or electronically</p>

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	<ul style="list-style-type: none"> • Applications and approvals for issuance and listing of securities • Press releases, publicly filed documents • Land title deeds/ documents/ receipts • Other Documents required to be permanently preserved under any applicable law/ regulation/ statute etc. • Other related Documents 		
	<ul style="list-style-type: none"> • Documents specified to be preserved for eight financial years under any applicable law/ regulation/ statute etc 	Eight financial years	Physical and/ or electronically
	<ul style="list-style-type: none"> • Details relating to unclaimed/ unpaid divided 	Seven years	Physical and/ or electronically
Legal	Executed copies of contracts/ agreements entered by the Company	Five years beyond the life of the contract or such period as may be specified under applicable law/ statute etc	Physical and/ or electronically
	<ul style="list-style-type: none"> • Documents relating to business projects/ contracts/ bids • Case file of all disputes with different authorities. • Registration/ renewal Documents • Documents relating to development of intellectual property • All Documents containing trade secrets • Original and supplementary license user agreements • Other related Documents 	Permanent	Physical and/ or electronically
	Documents relevant to litigation or any potential litigation (dispute that may result in litigation), claim,	Until the Legal Department of the Company determines in writing that	Physical and/ or electronically

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	audit, investigation or enforcement action.	such Documents are no longer needed.	
Production, purchases related records	<ul style="list-style-type: none"> • Production procedures, production data, system-based records, MIS, yield, rejections etc. • Other production related records required to be maintained under any applicable law/ statute etc. • Purchase orders, annual rate contracts, quotations and comparative quotation analysis etc. • Bill of entry/ bill of lading, shipping bill, airway bill etc. 	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Strategy/ projects	<ul style="list-style-type: none"> • Documents relating to green field / brown field projects • Statistical information, negotiation drafts, analysis reports etc. • Other related documents 	Five years beyond the life of the project/ assignment or such period as may be specified under applicable law/ statute etc	Physical and/ or electronically
Employment/ Personnel records	<ul style="list-style-type: none"> • Documents relating to individual personnel records, payroll, salary history, bonuses, performance reviews etc. • Other personnel related documents 	Eight financial years or such period as may be specified under applicable law/ statute etc.	Physical and/ or electronically
Information technology	<ul style="list-style-type: none"> • Documents in relation to procurement of IT hardware, software, licenses etc. • Operations & User Manuals • Licence and Information Security Register • Server logs • Disaster Recovery Site logs • Inventory of back up data • Other related Documents 	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically

Marketing and Sales records	<ul style="list-style-type: none"> • Final copies of marketing and sales documents • Sales & Marketing policies • Excise Invoices • Debit Note/Credit Notes • Credit Appraisal Forms & Ratings • Agreements with Agents • Collection Advices • Related MIS • Other related Documents 	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Incidental or other business-related information	<ul style="list-style-type: none"> • Drafts and preliminary versions of documents superseded by work paper and other transitory information 	As long as it remains relevant	Physical and/ or electronically
	<ul style="list-style-type: none"> • Any other Document relating to the business of the Company 	180 days or as long as it remains current	Physical and/ or electronically

Where the preservation period of Documents is not included in the above identified categories, such period shall be determined by the application of the general guidelines affecting Document preservation identified in this Policy, as well as any other pertinent factors. Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department in writing.

6. Accessibility and retrieval of records:

Retention of Physical records Preserved records shall be kept confidentially, securely with access control and with ease of retrieval, whether in-house or externally. Measures should be taken for physical security of the records maintained like selection of area of record room, firefighting device, access control, etc. ii. Retention of Electronic Records Wherever allowed/required by any law/statute, records may be maintained in electronic form.

In case records and documents are maintained in electronic form, all the requirements relating to Information Technology Act, 2000, including any statutory amendment(s) or modification(s) thereto, shall be adhered to. In case of switch-over to another electronic system, it should be ensured that all the records in the old electronic system should be migrated to new electronic system and all old records are accessible in the new system.

7. Archiving of documents hosted on the Company's Website:

- The events or information of the Company disclosed to the stock exchanges (the “Disclosed Information”) where the securities of the Company are listed, shall be disclosed on the website of the Company i.e. www.sintercom.co.in (the “Website”) and shall be hosted on the Website for a minimum period of five (5) years from the date of each such disclosure (“Mandatory Hosting Period”).
- Beyond the Mandatory Hosting Period, the Disclosed Information shall be archived for such other additional period as may be required considering the requirement of various statutes, law, regulations etc. and other legal & administrative aspects (the “Archival Period”).
- No Disclosed Information shall be deleted or destroyed or purged from the Website or from the archival without the prior written approval of any one of the Key Managerial Personnel of the Company appointed under the Companies Act, 2013.

8. Disposal or Destruction of the Documents

All information generated in the course of the Company’s business activities that is not required to be retained must be safely destroyed or discarded as soon as practicable, but in any event within 180 days of the completion of the project/assignment/contract.

i. Physical:

The Documents should be destroyed at the end of the preservation period specified under Clause 5 of this Policy. The destruction should be carried out in a way that preserves the confidentiality of any information they contain, if so required. A record should be kept about the Documents that have been destroyed.

Records which are required to be maintained for certain period of time, shall be added to the archive when it no longer has a business need. Files or items when added to the archive will be recorded on a database that shall be maintained by the facilities and retrieving the records from the archive must be for valid business reasons.

Office copies of Notices, Agenda, Notes on Agenda and other related papers of the transferor company, as handed over to the transferee company may be destroyed in terms of this clause and permission of the Central Government, where applicable.

Documents should be shredded through a paper shredding machine and not sold as scrap

ii. Electronic:

Electronic information, including e-mails that are no longer required to be retained, must be purged using appropriate techniques which ensure that the data cannot be reconstructed from the storage media on which it resided. Records stored on magnetic media must be destroyed by reformatting at least once. However, the backup copies of the records must also be destroyed.

9. Amendments:

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.