

**APL Metals Limited**  
**(Formerly Associated Pigments Limited)**  
**(CIN: L24224WB1948PLC017455)**  
**Regd Office – 18/1A Hindustan Road, Kolkata -700 029**

**Policy for Preservation of Documents and Archival of Documents**

**1. Introduction**

This policy is primarily made in compliance to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “**Listing Regulations**”) and Companies Act, 2013. Archival Policy as referred to in Regulation 30 (8) forms part of this Policy. This policy is intended to ensure compliance particularly with the Regulations, the applicable provisions of Companies Act, 2013 and to ensure preservation of records to meet obligations of organization required by law and other-wise to facilitate operations and compliances.

**2. Purpose of the Policy**

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as under –

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

The Company may keep documents specified in clauses (a) and (b) in physical or electronic mode. In terms of Regulation 30 (8) of the Listing Regulations company has framed archival policy as per which all events or information disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time. Hence, this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

**3. Policy**

**3.1 - Preservation of documents**

**(A) Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

1. Documents whose preservation shall be permanent in nature:
2. Documents with preservation period of not less than eight years after completion of the relevant transact. Indicative list for 1 and 2 as above is given separately in the policy
3. Documents with preservation period other than those mentioned in (2) above :  
All documents other than those mentioned in 1 & 2 above shall be preserved as per relevant legislative requirement applicable to such records/documents.

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**(B) Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations**

1. The Company is to maintain a functional website hosting all information/documents as required by regulations and applicable provisions of Companies Act, 2013.
2. The Company shall ensure that contents of the website are true and not misleading.
3. The Company shall update any change in the content of its website within prescribed time or as early as possible from the date of such change in content.
4. Information and/ or Documents that need to be made available under Regulation 30 of the Listing Regulations shall be made available on the website simultaneously with disclosure to Stock Exchanges.
5. The information and/or documents uploaded on the website shall be available for current financial year and for the preceding five financial years or as may be prescribed.
6. Information and/ or Documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers.

**3.2 - Archival of Documents mentioned in Clause (A) & (B) of Clause 3.1**

Documents mentioned in sub clause (A) & (B) of Clause 3.1 above shall be maintained/ preserved in the following manner:

**Documents maintained in physical form:**

1. All information and/or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
2. All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.

**Documents maintained in electronic form:**

All documents pertain to current financial year and for one preceding financial year shall be maintained on server and Backup be maintained on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.

Back up of all documents pertaining to the period prior to one preceding financial year shall also be maintained on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

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**Documents made available on the website of the company:**

After the expiry of time mentioned in Clause 3.1 (B) (5) of this policy (i.e. five financial years preceding the current financial year), the information and/or document shall be removed from the main website. The Backup of said information and/or document which is removed from the main website shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years the backup may be permanently removed from the server.

**3.3 - Destruction of documents mentioned in Sub Clause (A) & (B) of Clause 3.1 of this Policy**

Any of the documents mentioned in sub clause (A) & (B) of clause 3.1 of this policy, which are not required to be maintained and preserved permanently shall be destroyed.

If documents / records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use. The documents / records referred to in Annexure B shall be preserved for at least 8 years (or additional period decided by the Company) may be disposed of after the expiry of the periods of their preservation, after the approval by the concerned head of department , Chief Financial Officer , Company Secretary and Chief Executive Officer of the Company.

The respective department shall maintain a register of disposal of records relating to his department in his custody and overall record of all such register of disposal shall be kept in custody of HR/Administration head of the Company, wherein the brief particulars of the records disposed of shall be entered.

The register of disposal of records shall contain the following columns:

- a) Item Number;
- b) Brief Particulars of the records disposed of;
- c) Date of approval for disposal of records;
- d) Date of disposal; and
- e) Mode of destruction

This register of disposal of records shall be maintained permanently by the Administration head of the Company with the assistance of the Compliance Officer/ Chief Executive Officer for either in physical or electronic form.

**4 Amendments and updates**

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

The Managing Director / Chief Executive Officer of the changes in the company is authorized to make suitable necessary changes in the policy to ensure and facilitate compliances and effective record keeping.

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**Indicative list of Permanent and temporary documents –**

<b>Permanent Preservation</b>	<b>Temporary Preservation for a minimum period of eight Years</b>
Certificate of incorporation ,Memorandum and Articles of Association	All Registers required to be maintained for temporary period such as Register of Charges, Allotments, Annual Return , Redemption/Transfer of Securities , Deposits , Dividend etc
Minute Books of General Meetings, Board and Committee Meetings as per the Act	Attendance, Voting Results , Scrutineers Report for Voting by Members in General Meetings, Report of Auditors, Secretarial Audit, Cost Audit , Internal Audit , News Paper Notices/Advertisements , Compliance Report etc.
Listing Agreements made with Stock Exchanges, Depositories, RTA etc.	Audited Financial Statements along with Directors and Auditors Report, Disclosures in Annual Reports etc.
Authorization / licenses / Permissions/ Consents of permanent nature obtained from any statutory authority	Disclosures and Declarations from Directors of their Interest in Other Concerns, Consent to act as director, Confirmation of Independence,
Records and documents of title relating to land , building , factory premises etc.	Trade License's, Insurance , Pollution Control NOC , Municipal Taxes etc
All Registers , Records and documents required to be kept permanently as per provisions of the Companies Act,2013 , Listing Regulations and any other law .	Books of Accounts and Vouchers as per The Companies Act,2013 and Tax laws , Return filed with Income Tax, PF, ESI, Central Excise, DGFT, RBI etc
Policies of the Company framed under various Listing regulations and the Companies Act,2013	Disclosure/Return filled under SEBI Listing Regulations, The Companies Act,2013 and others
Register of disposal of records	Requirements) Regulations, 2015
All other records as may be required under any law from time to time	All other documents as may be required under any law or as may be decided by company.

**Annexure- II**

**The format of the register of Documents disposed/destroyed**

<b>Particulars of document alongwith provision of applicable law</b>	<b>Date and mode of destruction</b>	<b>Initials of the authorized person</b>