

SAMBHV STEEL TUBES LIMITED

Policy on Archival of Documents

1. BACKGROUND

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) mandate listed entities to formulate an archival policy. It is in this context that the Policy on Archival of Documents (“**Policy**”) is being framed and implemented by Sambhv Steel Tubes Limited (“**Company**”).

The Policy shall be applicable to the Company with effect from the listing of the equity shares of the Company on one or more recognized stock exchanges.

2. OBJECTIVE OF THE POLICY

Regulation 30(8) of the Listing Regulations requires the Company to disclose on its website all such events or information which has been communicated to the stock exchanges under the Listing Regulations, such information which has been communicated to the stock exchanges 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, which will be disclosed on its website. In line with the above and the requirements of the Listing Regulations, the Company will adopt the following policy for archival of the disclosures made on the website for information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations.

3. ARCHIVAL POLICY

In accordance with the provisions of the aforesaid Listing Regulations, the Company shall ensure that all the relevant information shall be hosted on the Company’s website for a period of five years. Thereafter, the disclosures of information and events communicated to the stock exchanges will be retained on the website of the Company in the section entitled “*Archives*” for a minimum period of two years. Subsequently, such disclosures shall be removed from the Company’s website and preserved by the Company. The disclosures shall be preserved for a further period of five years (“**Preservation Period**”). After the Preservation Period, such archives would be deleted or removed after obtaining approval of the Chief Financial Officer or the Company Secretary and Compliance Officer.

All information required to be uploaded on the Company’s website in pursuance of any other statute, legislation or regulation shall be hosted on the Company’s website, in the form, manner and for such period as may be mandated by that statute, legislation or regulation etc.

In cases where the concerned statute, legislation or regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of one year from the date of uploading or more if deemed necessary by the Chief Financial Officer or Company Secretary and Compliance Officer.

The Company Secretary and Compliance Officer or Chief Financial Officer shall have the discretion to host any of such documents/information on the website of the Company for such additional period as they deem fit on a case to case basis.

Any information, form, return, document etc. disclosed on the website, may be removed/ deleted from the website after such disclosure period.

4. AMENDMENTS AND REVIEW

This Policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.

5. DISSEMINATION OF POLICY

This Policy shall be hosted on the website of the Company.