

MANAKSIA STEELS LIMITED

Archival Policy

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1. Background and Objectives

In terms of Regulations 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Regulations'), "The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website."

The Board of Directors (the "Board") of Manaksia Steels Limited (the "Company") had initially adopted the Archival Policy (the "Policy"), in terms of Regulations 30(8) of the Regulations w.e.f. 10th February, 2016. The Board of Directors of the Company had amended the Policy at its meetings held on 11th November, 2021 and 25th May, 2023 respectively. The policy was further reviewed and approved by the Board at its meeting held on 12th February, 2025.

The Company has formulated this Policy for ensuring compliance with the provisions under Regulation 30(8) of the Regulations for protection, maintenance and archival of the Events or Information (defined below) disclosed to the stock exchange(s) which are also hosted on its website. Additionally, the Policy shall also include such other Events or Information which are required to be hosted on the website of the Company in terms of other Applicable Laws (defined below) as may be decided by the Authorised Person (defined below).

The goal of the Policy is to enhance transparency, accountability and better relationship with stakeholders, by providing for framework for disclosure of required information/ events on the website of the Company.

2. Definitions –

2.1 "Act" means the Companies Act, 2013.

2.2 "Applicable Law" means any law, rules, circulars, guidelines or standards under which disclosure of Events or Information on the website has been prescribed.

2.3 "Archived documents" means details of Events or Information (defined herein below) as placed or maintained in the archived folder.

2.4 "Authorised Person" means any person duly authorised by the Board or Managing Director or any Executive Director of the Company.

2.5 "Document(s)" refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence with Authorities or in pursuance of applicable laws, minutes, indices, registers and/ or any other record/s, 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/ print form or in Electronic Form and does not include multiple or identical copies.

2.6 "Board" means the Board of directors of the Company or its Committee.

2.7 "Company" means Manaksia Steels Limited.

2.8 "Events or Information" refers to the events/ information that are required to be disclosed on the website of the Company in terms of Regulation 30(8) of the Regulations and other Applicable Law.

2.9 "Regulations" means the Securities and Exchange Board of India (Listing Obligations 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. Applicability

This Policy covers archival of all Events or Information which has been disclosed to Stock Exchange(s) and hosted on the website of the Company in accordance with the Regulations, and making available such archived information so as to be retrieved subsequently by storing the same on suitable media.

4. Classification

The archival of Events or Information as disclosed and hosted on the website shall be done in the following manner:

- a) Where there is a period for which a Document is required to be archived as per Applicable Law, for the period required by Applicable Law. This includes, for instance:
 - Audio recordings and video recordings of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means, shall be hosted on the website of the Company for a minimum period of two years.
 - Transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means, shall be hosted on the website of the Company for a minimum period of five years
- b) Where there is no such requirement as per Applicable Law, then for a period of not less than three years.
- c) The Annual Report and Annual Return u/s 92 of the Act of the Company and the Financial Statements of the Subsidiaries, for a period of not less than five years.

5. Review and Approval of the Policy

The Board may modify, add, delete or amend any of the provisions of this Policy as and when

required, subject to such alterations being in consonance with applicable Regulations. Any exceptions to the Policy must be consistent with the Regulations and must be approved in the manner as may be decided by the Board of Directors.

6. Responsibility to review the website and Archived documents

In accordance with the provisions of Regulation 46 (3), the Authorised Person shall ensure to update any change in the content of the website within two working days of such change. The Authorized Person of the Company shall be responsible for periodic and ongoing review of the contents of the website and keep the information up to date.

The contents with respect to Events or Information as disclosed under Regulation 30(8) of the Regulations would be moved to the archived folder after a period of 5 years from the date on which such disclosures/ announcements were made.

The contents with respect to Events or Information other than those mentioned above shall be moved to archived folder at such frequency as may be decided by the Authorised Person subject to the provisions under Applicable Law, if any.

7. Removal of Archived documents

The archived documents will be available in the archived folder for a period of not less than three years and thereafter the archived disclosures/ announcements shall be removed from the website of the Company. The documents removed from the website shall be continued to be preserved in accordance with the Company's Policy on Preservation of Documents, and permanently disposed off thereafter.

The registers/ documents mentioned above may be destroyed in accordance with the provisions of the Act and the Listing Regulations and the Applicable Law, after the approval of the Board of Directors of the Company and in the presence of the Company Secretary and the CFO.

8. Location of archival

The archived folder shall be located on the website of the Company.

9. 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. Any change in the prescribed period of archiving in the Regulations or the other Applicable Laws shall mutatis mutandis apply to the corresponding related Clause of the Policy.