



# Frank Metals

## ARCHIVAL POLICY

**Version: 1**

**Version approved by: Board of Directors**

**Version approved on: June 08, 2025**

**Effective Date: June 08, 2025**

## **ARCHIVAL POLICY**

*[Pursuant to Regulation 30(8) and 46 of the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

### **1. BACKGROUND**

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Listing Regulations came into force from December 1, 2015. In terms of Regulations 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the ‘Regulations’), a listed entity is required to host on the website maintained by the entity i.e. <https://frankmetals.com/>, all the material events/ information as disclosed to the stock exchange(s) for a period of five years and thereafter in terms of the Archival Policy of such entity as disclosed on the website. It is in this context that the Document Retention and Archival Policy (“Policy”) is being framed and implemented by the Company.

### **2. SCOPE**

The Policy seeks 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.

### **3. OBJECTIVE OF THE POLICY**

1. The purpose of this Archival policy is to ensure that all documents/records/data which are required to be retained by the Company has been backed up appropriately and to safeguard against the loss of data that may occur due to hardware or software failure, physical disaster or human error.
2. In accordance with the provisions of the aforesaid regulation, the Company shall ensure that the information is hosted on the Company’s website for the said period.

The specified period shall be reckoned from the date of such events or information being placed on the website of the Company for the first time.

3. The objective of this policy is to:
  - a. Lay down the principles to archive the documents as per this policy, as and when required.
  - b. To disseminate equal, adequate and timely information to the shareholders through the website of the Company and to enable them to track the performance of the Company over regular intervals of time and assess the current status of the Company.

c. To ensure protection, maintenance and archival of its disclosures, documents and records that are placed on its website.

d. To lay down the principles to retrieve the documents which are archived as per this policy, as and when required.

#### 4. **DEFINITIONS-**

- 3.1) “**Act**” means the Companies Act, 2013.
- 3.2) “**Applicable Law**” means any law, rules, circulars, guidelines or standards under which disclosure of Events or Information on the website has been prescribed.
- 3.3) “**Archived documents**” means details of Events or Information (defined herein below) as placed or maintained in the archived folder.
- 3.4) “**Authorised Person**” means Company Secretary of the Company or any other person as may be decided by the Board or Managing Director or Whole Time Director from time to time.
- 3.5) “**Board**” means the Board of Directors of Frank Metals Recyclers Limited (formerly known as Frank Metals Recyclers Private Limited) or its Committee.
- 3.6) “**Company**” means “**FRANK METALS RECYCLERS LIMITED (FORMERLY KNOWN AS FRANK METALS RECYCLERS PRIVATE LIMITED)**”.
- 3.7) “**Events or Information**” refers to the information/ events that are required to disclose on the website of the Company in terms of Regulation 30(8) of the Regulations and other Applicable Law.
- 3.8) “**Policy**” means Archival Policy of Frank Metals Recyclers Limited (formerly known as Frank Metals Recyclers Private Limited).
- 3.9) “**Records**” in relation to this policy includes accounting records, “book and paper” and “book and paper” as defined in clause 12 of section 2, books of account as defined in clause 13 of section 2 of the Companies Act, 2013 and statutory and other documents of material significance.
- 3.10) “**Regulations**” means the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.
- 3.11) “**Stock Exchanges**” means BSE Limited and National Stock Exchange of India Limited.

The words, terms and expressions referred to in this policy will have the same meaning as defined under the Companies Act, 2013 (the “Act”) and the rules made there under and the SEBI Listing Regulations including any statutory modification or re-enactment thereto, as the case may be.

Unless otherwise stated specifically in this Policy:

- a) the clause headings are for ease of reference only and shall not be relevant to Interpretation;
- b) a reference to a clause number includes a reference to its sub-clauses;
- c) words in singular number include the plural and vice versa;

## **5. POLICY**

The Corporate records of **FRANK METALS RECYCLERS LIMITED (FORMERLY KNOWN AS FRANK METALS RECYCLERS PRIVATE LIMITED)** (the “Company”) are important assets. Corporate records include essentially all records, whether paper or in electronic form. A record may be in the form of a memorandum, an e-mail, a contract or a case study and includes computerized desk calendar, an appointment book or an expense record etc.

The Law requires the Company to maintain certain types of corporate records either permanently or for a specified period of time. Failure to retain the records could subject the employees and the Company to penalties and fines, cause the loss of rights, obstruct justice, adversely impact potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

The Company expects all employees to fully comply with this Policy, provided that all employees should note the following general exception to any stated destruction schedule:

If an employee has reasons to believe, or the Company informs the employee concerned, that Company records are relevant to litigation or potential litigation (i.e., a dispute that could result in litigation), then the employee must preserve those records until the Legal or Respective Department determines that the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records. If an employee(s) believe that exception may apply, or has any question regarding the possible applicability of that exception, he/she may contact the Office of Group General counsel.

The Company, from time to time establishes retention or destruction policies or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property. While minimum retention periods are suggested, the retention of the documents identified in those schedules and of documents not included in the identified categories should be determined by the Head of the Department, primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

## **6. COVERAGE**

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 SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Securities Laws / Other Applicable Laws.

## **7. CLASSIFICATION**

The Archival of Events or Information as disclosed or 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.
- b) Where there is no such requirement as per Applicable Law, then for a period of not less than three years.

In accordance with the Regulations, the presentation and the audio/video recordings and transcripts of post earnings/quarterly calls shall be hosted on the website of the listed company for a minimum period of five years. However, the recordings shall be maintained until the time of closure of any investigation undertaken on the business of the said meeting/call.

The documents and records may be archived in physical and/or electronic mode and shall be stored in the premises of the Company or with an approved warehousing agency in case of physical documents and on the server of the Company and/ or the server of any third-party vendor/ service provider in case of electronic documents having appropriate security and safety measures.

The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed in one of the following ways:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.

## **8. LEGAL DOCUMENTS**

Legal Documents shall include, but shall not be limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters.

A contract shall be retained for a period of 8 (Eight) Years or for 5 (Five) Years after the expiry of the term of the contract, whichever is higher.

Documents relating to any property owned by the Company shall be retained perpetually. Other property Documents shall be retained for a period of 8 (Eight) Years after the rights in such property ceases to exist, whichever is higher.

Orders passed by any Court or Tribunal or any Authority or Judgment which are final in

nature and cannot be superseded shall be retained permanently.

Interim Orders shall be retained till a Final Order is received or for a period of 8 (Eight) Years, whichever is higher.

Pleadings shall be retained for a period of 8 (Eight) Years or till the matter has been disposed off, whichever is higher.

**9. LOCATION AND MANNER OF ARCHIVAL**

The IT team of the Company shall be responsible for implementation of this policy and shall monitor the implementation. Backup and Retention of critical business data and applications shall be done periodically or in accordance with the provisions of applicable laws. Periodic restoration of backed up data shall be done to check for its availability, confidentiality & integrity.

IT Team shall retain the backup tapes pertaining to the Company's Financial and accounting data, reports, Employee Data, HR data, Legal Data etc. for at least eight years and ensure secure disposal upon expiry of such retention period in-compliance with laws applicable to the Company.

Electronic Media which has overdue retention period and which is no longer required for business purpose shall be disposed in secure manner such that data on it shall not be recoverable by any means.

All such events or information so disclosed on the website of the Company pursuant to the Listing Regulations, shall be archived after the expiry of their specified period from the date of such posting and moved to the location or placed under – “Archive”.

The events/information so archived under “Archive” shall be preserved for a further period of one year or till the time such events or information are resolved or closed, whichever is later.

**10. AUTHORITY FOR APPROVAL OF POLICY**

The Board shall have the authority for approval of this policy in pursuance to these Regulations.

**11. AUTHORITY TO MAKE ALTERATIONS TO THE POLICY**

The Board is authorized to make such alterations to any of the provision of this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations. The Board may also establish further rules and procedures, from time- to- time, to give effect to the intent of this Policy and further the objective of good corporate governance.

a) **RESPONSIBILITY TO REVIEW THE WEBSITE AND ARCHIVED DOCUMENTS**

In accordance with the provisions of Regulation 46 (3), the Authorised Person shall ensure to up date 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.

**12. REMOVAL OF ARCHIVED DOCUMENTS**

The archived documents will be available in the archived folder for a period of three years. After the expiry of three years, the archived disclosures/ announcements shall be ceased to be displayed on the website of the Company.

**13. ACCESS TO THE ARCHIVED DOCUMENTS**

The contents of archived folder, on the website of the Company shall not be accessible to public.

**14. AMENDMENT /REVIEW:**

1. The Audit Committee shall review the Policy at least once in three year or according to the need of the respective departments and recommend the necessary changes to the Board for its approval.
2. The Policy would be subject to revision/ amendment in accordance with the applicable laws.
3. The Company reserves its rights to alter, modify, add, delete or amend any of the provisions of this policy.
4. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions herein and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

**15. EFFECTIVE DATE:**

The Board of Directors of the Company has approved the Archival Policy on June 08, 2025.