

KENNAMETAL INDIA LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL

1. Objective

a) In terms of regulation 9 of SEBI (Listing obligation and disclosure requirements) Regulations, 2015 (The Regulation), the Board of Directors (the "Board") of Kennametal India Limited (the "Company") has approved this revised policy for preservation of documents in its meeting held on February 04, 2016. This policy is in addition to Kennametal Inc. Global Records Management Procedure which is applicable to all subsidiaries of Kennametal Inc. This Global Procedure defines key terms and establishes standards for the retention, storage and destruction of all records for Kennametal.

b) The Regulation requires every listed company to classify the documents in at least two categories as follows:

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

Provided further that the Company may keep the documents as specified above in electronic mode.

2. Responsibilities

All employees of the Company must fully comply with the standards established in the Global Procedure and in this policy.

3. Provision with regard to Preservation of Documents under various Laws

The Company has been following the Global Record Management Procedure which is intended to establish a procedure for all entities of Kennametal worldwide to manage, maintain and dispose of records in an orderly, reasonable and lawful manner and also defines the record retention period under Schedule-A of the procedure. Some categories of documents that bear special consideration are identified below. The retention period for the documents not defined under the global procedure or under this policy should be determined primarily by the application of the general guidelines affecting document retention as per applicable laws and regulations, as well as any other pertinent factors.

- (a) **Filing with SEBI, Stock Exchange and MCA:** Unless specified otherwise, all the documents filed with the Securities Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA) or Stock Exchange should be retained for 8 years physically or in electronic form.
- (b) **Tax Records:** Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues.

Tax records may be retained for at least Eight years from the date of filing the applicable return.

- (c) **Board and Board Committee Materials:** Meeting minutes should be maintained on permanent basis.

- (d) **Press Releases/Public Filings:** Press releases / public filings related documents should generally be maintained for a period of eight years or till the completion of the case, whichever is later.
- (e) **Legal Files:** Legal counsel should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of eight years or till the completion of the case, whichever is later.

4. Modes of preservation

4.1 The Documents may be preserved in

- 4.1.1 Physical form or
- 4.1.2 Electronic Form.

4.2 The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

4.3 The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

5. Archival Policy

5.1. The Company has adopted the global Data and Document Archiving Policy which is applicable to all subsidiaries of Kennametal Inc. and the policy is intended to implement data retention guidelines in line with the Global Records Management Procedure. This policy defines key terms and establishes standards for the retention and storing of data.

5.2 The Company in addition to following the global Data and Document Policy will also ensure that the documents available on www.kennametal.com/Kennametalindia as per the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, shall be archived and be available on request upto next 2 (Two) years post mandatory statutory requirement of retention is over.

6. Conflict

In any circumstance where the terms of this policy differ from Kennametal Inc. Global Records Management Procedure, the terms of this policy will prevail.

7. Amendment

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

Reference of policies:

- 1. KENNAMETAL INC. GLOBAL RECORDS MANAGEMENT PROCEDURE**
- 2. DATA AND DOCUMENT ARCHIVING POLICY**