

# POLICY ON PRESERVATION OF DOCUMENTS

## 1. INTRODUCTION

This Policy has been framed and adopted by **RISHABH DIGHA STEEL AND ALLIED PRODUCTS LIMITED** in compliance with the requirements of the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations") with the objective of classifying various documents, record and registers for the purpose of maintenance and preservation.

## 2. APPLICABILITY

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

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

Further, Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information, which have been 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, as disclosed on its website.

## 3. PURPOSE OF THE POLICY

The purpose of this policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is intended to provide guidance to Employees of the company in handling all the necessary documents and records efficiently.

## 4. DEFINITIONS:

**"Act"** means the Companies Act, 2013

**"SEBI Listing Regulations"** means SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended.

**"Company"** shall mean of **RISHABH DIGHA STEEL AND ALLIED PRODUCTS LIMITED**

**"Applicable Law"** means any law, rules, circulars, guidelines or standards under which the preservation of the Documents has been prescribed.

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

**"Document"** as per section 2(36) of the Companies Act 2013 includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

**"Electronic Record(s)"** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

**"Electronic Form"** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval

device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“**Maintenance**” means keeping Documents, either physically or in Electronic Form.

“**Preservation**” means to keep in good order and to prevent from being damaged or destroyed.

“**Records**” means documentary evidence of past events or transactions.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

## **5. MODES OF PRESERVATION:**

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

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

## **6. ROLES & RESPONSIBILITIES:**

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

## **7. DESTRUCTION OF DOCUMENTS:**

All records mentioned in Schedule A which are temporary in nature must be preserved for not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed.

All records mentioned in Schedule B need to be preserved by the Company permanently during the entire life of the Company.

The period stated above is minimum retention/preservation period. Prior to actual destruction/disposal in terms of this policy, the retention schedule may be reviewed by the Board of Directors if required due to an on-going business use, internal audit requirement or any other like reason.

The temporary Documents shall be destroyed after the relevant or prescribed period by the Person Authorised by the Board

Electronic documents shall be removed after the expiry of prescribed retention period from all identified electronic repositories.

## **8. AMENDMENT TO THE CODE:**

The policy can be amended /modified by the Board of Directors of the Company from time to time in line with Applicable Laws with regard to maintenance and preservation of documents and records.

## **SCHEDULE A**

- Proxy forms
- Representation letters
- Annual reports and Annual returns
- Consent and Resignation Letters received from the Directors
- Board Agenda and supporting Documents
- Office Copies of Notice of General
- Meeting and related papers
- NSDL/CDSL Files
- Annual financial statements including Annual Accounts, Directors report & Auditor's report
- Declaration by directors under section 164 of the Companies Act, 2013
- Declaration by directors under section 184 of the Companies Act, 2013
- All documents under the Listing Agreement
- Notice of General Meetings and Board Meetings
- Documents on which the common seal of the company has been affixed.
- Advertisements published

## **SCHEDULE B**

- Certificate of incorporation & Certificate of change of name (if any)
- Common Seal
- Memorandum and Articles of Association as amended from time to time
- Counter folios of Share Certificates issued from time to time
- Minutes Book & Circular resolutions
- Statutory Registers
- License & Permissions
- Scrutinizers Reports
- Register of members & Index of Members
- Listing Agreement
- Central Government Approvals received
- Any other Document / Information / Record as per the provisions of any other applicable Law or Regulation to the extent applicable to the Company.
- Disclosures under takeover code

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