



POLICY ON

PRESERVATION OF

DOCUMENTS

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1. PREAMBLE:

The Board of Directors (the "Board") of Ratnamani Metals & Tubes Limited (the "Company" or "RMTL"), has adopted the following policy and procedure with regard to preservation of documents in their Board Meeting held on 4th November, 2015 as defined below. The Board shall review and may amend this policy from time to time.

2. PURPOSE:

This policy is framed as per requirement of Regulation 9 of SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015.

3. INTRODUCTION:

A document preservation policy contains the guidelines how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of if no longer needed and how should be accessed or retrieved when they are needed as per the rules made under the law.

4. DEFINITIONS:

"Act" means the Companies Act, 2013.

"Board" means Board of Directors of the Company

The "Company" or "RMTL" means Ratnamani Metals & Tubes Limited.

"Documents" means Document as defined in sub-section (36) of Section 2 of the Companies Act, 2013. Documents include 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.

"Maintenance" means keeping registers and records, either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such registers and records.

"Preservation" means to keep in good order, to prevent from being damaged or destroyed.

"Register" means a register maintained under the Companies Act, 2013 or the SEBI Act.

"Policy" means Policy on Preservation of Documents

"ICSI" means the Institute of Company Secretaries of India

"SS-1" means Secretarial Standard-1 for the Board Meetings as notified by the ICSI

"SS-2" means Secretarial Standard-2 for the General Meetings as notified by the ICSI

"SEBI (LOADR) Regulations, 2015" means Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulation, 2015

"SEBI" means Securities and Exchange Board of India

“**Compliance Officer**” means the Company Secretary and/or a Key Managerial Personnel appointed by the Board of Directors of the Company as the Compliance Officer for the purpose of these regulations from time to time.

“**Rules**” means rules made under Companies Act, 2013

“**Regulations**” means regulations made under SEBI Act.

5. LEGISLATIVE FRAMEWORK :

- I. Companies (Preservation and Disposal of Records) Rules, 1966
- II. Companies Act, 2013.
- III. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

The Board of Directors shall decide necessity of preservation of documents permanently from time to time as required under the Act and Regulation. Notwithstanding anything contained herein the Act, SS-1 and SS-2 the following documents / records maintained under the Act, Rules and Regulations shall be preserved permanently:-

- I. Financial Statements, duly signed annual reports.
- II. Annual Returns filed with the Registrar of Companies (RoC).
- III. Minutes of all the General Meetings, Board & Committee Meetings.
- IV. Disclosures made under the SEBI Insider and Takeover Regulations and the SEBI (LOADR) Regulations, 2015 to the Stock Exchanges from time to time.
- V. Memorandum and Articles of Association of the Company as may be amended from time to time.
- VI. Shareholders and Joint Venture Agreements.
- VII. Letter of Offer related to public issue, right issue, further issue, buy back offer.
- VIII. Agreement with the Share Transfer Agent, Depositories.
- IX. Common Seal
- X. Licence and Permission
- XI. Index of Members, Register of Members and Share Transfer register
- XII. Statutory Register maintained under the Companies Act.
- XIII. Scrutiniser’s Report.
- XIV. Any others, if Board of Directors may think deemed fit.

7. DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS COMPLETION OF THE RELEVANT TRANSACTIONS:

- i. Notice of the Board meetings given to the Stock Exchanges for considering matters relating to pre-intimations required to be submitted to the Stock Exchanges, Proxies Forms and its register.
- ii. Date for the Book Closures and Record dates for various purposes as may be decided by the Company from time to time.
- iii. Quarterly, Half Yearly and Annual financial results of the Company.
- iv. Quarterly shareholding pattern including details for pledge of shares and any changes therein.

- v. Results of the E-voting, General Meetings, Postal Ballot etc.
- vi. List of unpaid dividend to the shareholders.
- vii. Change in the constitution of the Board of Directors, KMP, Compliance Officer, Statutory Auditors, Secretarial Auditors and Share Transfer Agent.
- viii. Any Price Sensitive Information given or provided to the Stock Exchange under Regulation 30 of the SEBI (LOADR) Regulations, 2015.
- ix. Recommendation and payment of dividend to the shareholders.
- x. Details of the Complaints received and resolved by the Company.
- xi. Corporate Governance Report submitted to the Stock Exchanges on quarterly and annual basis.
- xii. Copy of the orders issued by the SEBI or Stock Exchanges relating to securities listed with the Stock Exchanges.
- xiii. Disclosure of Directors made under Companies Act, 2013.
- xiv. Registers maintained under the Companies Act, 2013.
- xv. Attendance Register & Board Agenda & their Supporting Documents.
- xvi. Instrument creating Charge, modification, satisfaction thereof.

The Board of Directors may decide the preservation period for any particular documents.

8. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS:

The Company Secretary and in his absence thereof any Key Managerial Personnel appointed by the Board of Directors of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain / preserve or destroy documents pertaining to their area.

9. AUTHORITY FOR MONITORING THE POLICY:

The Company Secretary of the Company is authorised by the Board of Directors of the Company shall be responsible for monitoring the policy. The authorised person shall inform the Board of Directors about the monitoring of the policy.

The authorised person shall take necessary step to discharge his duty.

10. PRESERVATION PRINCIPLES:

It is only through preservation that continued availability and access to items in the collections can be maintained.

The following principles shall be kept in mind:-

- i. Where possible, documents are preserved in their original format, respecting the physical integrity and authenticity of the original documents.
- ii. Active conservation is employed when appropriate to prevent further deterioration or damage to an item, or to enable access to be given.
- iii. Appropriate conservation measures will take into accounts the needs, value, significance and usage of the item in question.
- iv. Surrogates shall be created where appropriate to protect the original and to allow wider access to the content. Surrogates shall not replace the original, which will still need preservation.

- v. All staff is made aware of the paramount importance of preservation and are trained on safe handling of documents.

11. SECURITY OF DOCUMENTS:

The Board shall ensure that all the documents shall be kept in safe place in the Company premises. The Board may authorise Company Secretary / any person for the security of documents, who shall be responsible for safe custody of documents.

12. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS:

In case, the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning of the Company or commencement of any litigation against the Company, such employee shall inform the Company Secretary and any further disposal of documents shall be suspended until such time as the Company Secretary with the due advice from the legal counsel determine otherwise. The Company Secretary in such case shall inform all the employees the need to retain the documents and suspension of disposal of the same.

13. DISPOSAL OF DOCUMENTS:

Disposal of documents after said period of 8 years (whose preservation shall not be permanent in nature) shall be done in the presence of Authorised person by making an entry in the register of disposal of documents as mentioned in **Annexure-"A"** of the Company.

14. MANNER OF PRESERVATION OF DOCUMENTS:

The Company shall keep / preserve documents either in physical or electronic mode.

15. REVIEW OF THE POLICY:

The Board of Directors of the Company shall review the policy on annual basis. The authorised person shall provide regular assurance to board of directors on the effectiveness of the policy.

Date: 4th November, 2015

Place: Ahmedabad

ANNEXURE – “A”

**SPECIMEN FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED OF /
DESTROYED**

PARTICULARS OF DOCUMENT ALONGWITH PROVISIONS OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON
