

INDAG RUBBER LIMITED

(CIN-L74899DL1978PLC009038)

Policy on Preservation of Documents

INDAG RUBBER LIMITED

Policy on preservation of documents

1. Objective

This policy is framed pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter called as “**The Regulations**”) which shall be effective from 1st December, 2015.

2. Definitions -

2.1 “Act” means the Companies Act, 2013.

2.2 “Applicable Law” means any law, rules, circulars, guidelines or standards issued by Securities Exchange of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

2.3 “Authorised Person” means any person duly authorized by the Board.

2.4 “Board” means the Board of Directors of the Company or its Committee.

2.5 “Company” means Indag Rubber Limited

2.6 “Compliance Officer” means the Company Secretary of the company who is responsible to perform duties as required under section 205 of the Companies Act, 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

2.7 “Current Document(s)” means any document, that still as an ongoing relevance with reference to an ongoing litigation, proceedings, compliant, dispute, contract or any like matter.

2.8 “Director” means any person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed in the Company.

2.9 “Document(s)” means Document as defined in sub-section (36) of Section 2 of the Companies Act, 2013 and refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and any other record, 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 or in electronic form and does not include multiple or identical copies.

2.10 “Employees” shall mean the employees and office bearers of the Company.

2.11 “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.

2.12 “Maintenance” means keeping documents, either physically or in electronic form.

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

2.14 “Regulations” shall mean SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015

2.15 “Secretarial Standards” means standards issued by the Institute of Company Secretaries of India under section 118(10) of the Companies Act, 2013.

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

3. Preservation of Documents

The company records various information relating to the activities and business in physical form and electronic form.

Documents/information can be preserved under following categories:

- a) The documents listed in Annexure-I shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.
- b) The documents listed in Annexure II shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided further that the Company may keep the documents as specified above in an electronic mode and any change in the governing laws affecting the change in the period of preservation of documents shall prevail over this policy.

4. Responsibility:

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

5. Authority for approval and alterations of Policy

The Board shall have the authority for approval and to make alterations to 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.

6. Destruction of Documents

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode, as approved by the department head(s).

It applies to both physical and electronic documents.

Annexure-I

1. Documents/Registers under the Companies Act, 2013 shall be preserved as under:

Sr. No.	Name of the Documents/Register	Preservation Period
1.	All Blank Forms to be used for issue of share certificates	Permanently
2	Register of issued, renewed and duplicate share certificate	Permanently
3	Register of charges	The register of charges shall be preserved permanently and the instrument creating a charge or modification thereon shall be preserved for a period of eight years from the date of satisfaction of charge by the company.
4	Register of members	Permanently
5	Minutes of the General Meeting, Board Meeting and Committee Meeting	Permanently
6	Register of directors and key managerial personnel and their shareholding	Permanently
7	Loan, Investment and Guarantee by a company	Permanently
8	Contracts or arrangements in which directors are interested	Permanently
9	Documents duly stamped in original relating to incorporation and matter incidental thereto, changes in any clause of Memorandum and Articles of Association	Permanently

2. Preservation of Corporate Policies:

The Company shall preserve permanently various policies framed under Companies Act, 2013 and SEBI regulations from time to time viz:

1. Code of Conduct for Board of Directors and Senior Management
2. Corporate Social Responsibility Policy
3. Related Party Transaction Policy
4. Risk Management Policy
5. Remuneration Policy
6. Whistle blower Policy (Vigil Mechanism)
7. Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders
8. Code of practices and procedures for fair disclosure of unpublished price sensitive information
9. Policy on materiality of events
10. Policy for preservation of Documents
11. Prevention of Sexual Harassment at workplace Policy.

Annexure -II

1. Other Registers and Records maintained under Companies Act, 2013 shall be preserved as under:

Sr. No.	Name of the Documents/Register	Preservation Period
1	Register of Directors' Attendance	Eight years
2	Register of Member's Attendance	Eight years
3	Ballot Papers & Scrutinizer Report	Eight years
4	Register & Records of Postal Ballot	Eight years
5	Documents/forms filed with Register of Companies	Eight years
6	Annual Reports	Eight years
7	Financial Documents in respect of Borrowings	Eight years from re-payment
8	Register of transfer and transmission	Eight years
9	Annual Return	Eight years from the date of filing with the Registrar.
10	Proxies and Proxy Register	Eight years
11	Dividend Register and Records.	Eight years
12	Books of Accounts etc.	Eight years
13	Disclosure of Interest by Directors	Eight years
14	Notices, Agenda, Notes on Agenda and other related papers	Eight years
15	Share Certificates surrendered to the Company	Three years

2. Disclosures made/received under SEBI Regulations shall be preserved as under:

Sr. No.	Name of the Documents/Records	Preservation Period
1	Disclosure made under Regulation 6 under SEBI (Prohibition of Insider trading) Regulations, 2015	Five years
2	All events/informations which has been disclosed to stock exchange(s) under Regulation 30	Disclosures of such events/informations shall be hosted on the website for five years and thereafter as per the archival policy of the Company
3	Proper verifiable dated records of all correspondence with the investor shall be maintained by the Company under Regulation 40(3)	Five years
4	Disclosure made under SEBI(Substantial Acquisition of Shares and Takeovers) Regulations, 2011	Five years

