

## **POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS**

### **Introduction**

The Securities Exchange Board of India (SEBI), on September 2, 2015, has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Regulations”). As per Regulation 9 and Regulation 30 (8) (a) of the Regulations, Ram Ratna Wires Limited (“the Company”) has adopted a policy namely “Policy on Preservation and Archival of Documents” (“the Policy”) by passing a Board resolution on 30 May 2019.

This Policy has been framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy should contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed off, if no longer needed and how the documents should be accessed and retrieved when they are needed.

### **Definitions**

“Act” shall mean the Companies Act, 2013, rules framed there under and any amendments thereto.

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

“Authorised Person” means any person duly authorised by Managing Director.

“Board” means the Board of directors of the Company or its Committee.

“Documents” means all papers, certificates, records, registers, agreements, contracts, notices, orders, declarations, files, forms, books, letters, electronic forms and letterheads, tapes, CDs, DVDs, electronic storage devices etc., as required to be maintained under various law and regulations for the time being in force and Company’s Policies.

“Electronic form” with reference to information means, any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

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

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

All other words and expressions used but not defined in this policy but defined in the SEBI Act, 1992, Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and/ or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

## **Scope of the Policy**

This Policy is intended to guide the Company and its officer on maintenance of any Documents, their preservation and disposal.

## **Preservation and Archival of Documents**

The Company shall maintain and preserve the documents either in physical or electronic mode as permitted by the applicable laws. The documents of the Company shall be preserved in the following manner:

1. Documents mentioned in Annexure A shall be preserved and maintained perpetually by the Company subject to the modifications, amendments, additions or deletions or any changes made therein from time to time. Provided that the Company shall also preserve all such modifications, amendments, additions or deletions in the documents permanently.

2. Documents listed in Annexure B whose preservation shall be temporary in nature and shall be maintained in the following manner:

- All such documents having preservation period of 8 (eight) years or period as per applicable laws, shall be preserved for such period as prescribed under the applicable laws but not less than 8 (eight) years.
- All other documents for which the period of preservation is not prescribed under any laws shall be preserved for a minimum period of 8 (eight) years or any such specific period as the Company deems necessary.
- In case of overseas Subsidiaries/entities, such Subsidiary/entity shall also comply with the requirements of local law for preservation documents, in addition to the requirements stipulated through this policy.

3. In line with the Company's Policy on Determination of Materiality of Events and as per the Regulations, the Company shall disclose all material events to the Stock Exchanges and ensure that such events or information as disclosed to the Stock Exchange/s shall be made available on the Company's website for a period of 5 (five) years and thereafter backup of the soft copy shall be maintained on local server for a period of 3 (three) years.

4. All departments of the Company shall ensure that the documents pertaining to their department are preserved as per the Policy. It shall be the duty of the Heads of Department ("HOD") to ensure that they comply with the requirements of the Policy.

5. Any violation of this Policy by any employee may result in stringent action which may include immediate termination of employment as well. The Board of Directors at its own discretion may give an opportunity of being heard to any employee.

6. The backup be maintained on scheduled time and day of all documents pertaining to the period prior to one preceding financial on server, in good condition at least up to the minimum period specified for their maintenance / preservation. For ease of record reference, the Documents shall be preserved in an indexed form. The Documents shall be indexed appropriately by the Authorised Person. The index shall

be updated as and when any changes occur in the records. The index shall be kept in physical form or in Electronic Form

7. The Company has identified a list of documents with their respective period of preservation, which is given as an annexure to this Policy. The list is illustrative and not exhaustive

#### **Disposal and Destruction of Documents**

The documents listed in Annexure B, which no longer require any preservation may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required to be preserved as per the documents Preservation Schedule given under Annexure B. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records, to be kept by employees who are disposing of the documents in the format prescribed as Annexure C. The entries in the register shall be authenticated by the Authorised Person.

#### **Amendment**

The Board shall have power to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Act, Regulations thing and other applicable laws.

### Annexure-A

Documents whose preservation shall be permanent in nature

<b>Sr.No</b>	<b>Particulars</b>
1.	Documents and information filed with ROC for Incorporation of the Company
2.	Common seal, certificate of incorporation and certificate of change of name, if any)
3.	Certificate for commencement of business, if any
4.	Memorandum of Association and Articles of Association as amended from time to time
5.	Agreements made by the Company with the Stock Exchanges and Depositories, etc.
6.	Cancelled Share certificates.
7.	Minutes Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013 and the Regulation
8.	Licenses and permissions
9.	Order from Courts and any other regulatory authorities
10.	Statutory registers required to be maintained under various applicable laws
11.	Statutory forms except for routine compliance
12.	Any other documents as may be required to be maintained in terms of applicable law(s) and preserved from time to time
13.	Scrutinizers report

### Annexure-B

Documents with preservation period of not less than eight years after completion of the relevant transactions

<b>Sr. No</b>	<b>Particulars</b>
1.	Annual Returns
2.	Attendance Register of Board/General Meeting
3.	Income tax papers
4.	Office copies of Board Meeting Notices, Agenda, notes on agenda and other related papers
5.	Documents of Human Resource department as per relevant applicable law
6.	Disclosure of interest by the Directors
7.	Disclosures prescribed under SEBI (LODR) Regulations, SEBI (PIT) Regulations, SEBI (SAST) Regulations
8.	Instrument creating a charge or modification
9.	Books of accounts and financial statements etc.
10.	Any other important documents including tax filling and papers, project documents and any other such documents and papers.

Annexure-C

Specimen format of the register of documents disposed-off / destroyed

<u>Particulars of document along with provision of law</u>	<u>Date and mode of destruction</u>	<u>Initials of the authorised person</u>