

## **N R INTERNATIONAL LIMITED**

### **POICY FOR MAINTENANCE & PRESERVATION OF DOCUMENTS & ARCHIVAL**

The Board of Directors of N R International Limited (“the Company”) adopted a policy for Preservation of Documents under “Regulation 9” of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

This policy shall be known as “Policy for Maintenance and Preservation of Documents & ARCHIVAL”

#### **Purpose of the Policy**

The purpose of this policy is to specify the type of documents (and time period for preservation based on the classification mentioned under Regulation 9 of the Listing Regulations, 2015.

#### **Type of Documents and time period for Preservation**

The Company shall maintain and preserve documents as specified under:-

**Category ‘A’** The documents of permanent nature (listed in Annexure I) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

**Category ‘B’** The documents of the Company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in Annexure II) shall be preserved by the Company for the term not less than eight year after completion of the relevant transactions, amendments, addition or deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

For the purpose of this policy, document may include the following:

1. “Books and Papers” as defined in Clause 12 of Section 2 of the Companies Act, 2013.
2. “Books of Accounts” as defined in Clause 13 of Section 2 of the Companies Act, 2013.
3. “Documents” as defined in Clause 36 of Section 2 of the Companies Act, 2013.
4. Register of Company as defined in Clause 74 of Section 2 of the Companies Act, 2013.

## **AMENDMENT:-**

Any change in this Policy shall be approved by the Board of Directors of the Company.

**Policy Review-** This policy shall be subject to review of the Board and may be amended as may be deemed necessary and or in accordance with any regulatory amendment.

The two categories for preservation of documents are given in Annexure below-

### **Annexure-I**

Documents where preservation shall be permanently in nature.

#### **Nature of Document(s)**

The below is the illustrative list of documents required to be maintained permanently by the Company:

- All documents & information originally filed with ROC for incorporation of Company
- Register of Members and Index of Members (Section 88)
- Minutes Book of Board meeting, Committee Meetings and General Meeting (Section 118)
- Register of Directors & Directors Shareholding (Section 170)
- Register of Loans & Investments (Section 186)
- Register of Contracts & Arrangements (Section 189)
- Register of Charges (Section 185)
- Memorandum of Association & Articles of Association as originally filed and updated from time to time.
- Any other document as required by any law/ and or regulation in force.

### **Annexure II**

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

- Annual Return and related Annexures (Section 92) & copies of all certificates and documents required to be annexed thereto
- Financial Statements and related annexures (Section 129)
- Books of Accounts and related books & papers (Section 128)
- Form MBP-1 for disclosures of interest of Directors (Section 184)
- Attendance Register of Board Meeting, Committee Meeting and General Meeting (Secretarial Standard 1 & 2 )
- Instruments for creation / modification of charges (Section 84)
- Any other document as required by any law/ and or regulation in force.
- Office copy of Notices, Agendas

The above list of documents is illustrative and reference should be drawn from relevant Acts, Rules, Legislations, Guidelines, etc for other documents and their preservations timelines.

Other Records of the Company include but is not limited to legal files, marketing and sales documents, e-mail, contracts, invoices, tenders etc.

The retention period and other relevant aspects to ensure proper preservation of the aforesaid records of the Company will be as per the guidelines/instructions issued by the relevant functional heads or as may be decided by the Board from time to time.

Registers / Documents can be destroyed after expiration of the period as indicated under the relevant law/ rules under authority of the Board or by the Committee as authorized.

### **Electronic Documents including Email retention and back up.**

#### **Electronic Mail**

1. All e-mail from internal & external sources to be deleted after they cease to be current use.

#### **Web Page files**

1. All such events/ information hosted on Company's website shall be retained for a period of 5 years as specified in SEBI (LODR) Regulation, 2015
2. After the initial period of 5 years, documents and information (except document of permanent nature) shall be archived by the I.T. department for a further period of 3 years.
3. Documents of permanent nature uploaded on the Company's website shall be archived by the I.T. department.

### **Annexure III**

The format of the register of documents disposed/ destroyed.

Particulars of document alongwith provision of applicable law.	Date & mode of destruction	Initials of the Authorised person
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