

NILKAMAL LIMITED

POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

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Nilkamal Limited

Policy on Preservation and Archival of Documents

(In accordance with requirement of Regulation 9 and 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.)

Preamble:

This policy deals with the preservation and archival of the corporate records of Nilkamal Limited (hereafter, the “Company”).

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), as amended from time to time, Nilkamal Limited (the Company) is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations in at least two categories as specified in the said Regulation.

Objective:

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under the Listing Regulations, in terms of Regulation 9 and also to archive any of the material of events or information which are disclosed by the Company to the Stock Exchanges in terms of Regulation 30.

Preservation of documents:

Documents and records of the Company required to be maintained under the Listing Regulations shall be classified into two categories as below:

- a) Documents whose preservation shall be permanent in nature, shall be preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time as mentioned in part A.
- b) Other documents shall be preserved for a period of 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 as mentioned in part B.

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The documents which are not getting covered under either Part A or Part B shall be preserved as per the applicable provisions of the Act and / or Listing Regulations or other applicable laws.

Provided further that the Company may keep the documents as specified above in electronic mode.

The senior management or any Committee of the Board are authorized to comply with the requirements of any local, state, central legislation that may be promulgated from time to time and accordingly maintain and preserve the required documents.

Archival Policy:

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of five years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of three years.

The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the Company.

Destruction of Records:

Documents and records specified in part B of the policy, which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed in one of the following ways:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.

Roles and Responsibilities:

Every function/unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy.

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Review and amendments:

The policy shall be reviewed periodically by any committee authorised thereof or by the Board, in order to comply with any local, state, central legislations that may be promulgated from time to time. The Committee or the Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s). However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

PART A - DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE: -

The Company shall permanently preserve the following documents: -

1. Register of loans, guarantee, security and acquisition made by the Company, if any.
2. Register of investments not held in Company's name, if any.
3. Register of contracts or arrangements in which directors are interested, if any.
4. Register of Charges, if any.
5. Register of Members along with the index, either by Company or through its Registrar & Share Transfer Agent.
6. Register of Renewed and Duplicate Share Certificates, if any, either by Company or through its Registrar & Share Transfer Agent.
7. Register of Directors and Key Managerial Personnel.
8. Minutes of General Meetings.
9. Minutes of Board or Committee Meetings
10. All books and documents relating to the issue of share certificates, including the blank forms of share certificates shall be preserved permanently in case of disputed cases, either by Company or through its Registrar & Share Transfer Agent.
11. Any other document required to be permanently preserved by the Company under any law for the time being in force.

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PART B - DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS: -

The Company shall preserve the following documents for the time period as given below:

1. Books of Accounts relating to a period of not less than eight financial years immediately preceding the current Financial Year shall be preserved and kept in good order.
2. Disclosures/ Notices by a Director of his interest (i.e. Form MBP-1 or any other format prescribed from time to time) shall be preserved for a period of eight years from the end of the financial year to which it relates.
3. Registers of Deposits, if any, shall be preserved for a period of not less than eight years from the financial year in which the latest entry is made in the register.
4. The instrument creating a charge or modification, if any shall be preserved for a period of eight years from the date of satisfaction of charge by the Company.
5. Annual return and copies of all certificates and documents required to be annexed thereto shall be preserved for a period of eight years from the date of filing with the Registrar.
6. All certificates surrendered to the Company and which have been defaced by stamping or printing the word “cancelled” in bold letters shall be preserved for at least three years from the date on which they were surrendered, either by Company or through its Registrar & Share Transfer Agent.
7. Attendance Register of Board & Committee meetings to be preserved for at least eight financial years.
8. Office copies of Notices, Agenda, Notes on Agenda and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later.
9. Office copies of Notices, scrutinizer’s report, and related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later.
10. The disclosures made under SEBI (Prohibition of Insider Trading) Regulations, 2015 shall be preserved for a minimum period of five years.
11. Any other document as may be required to be preserved by the Company under any law for the time being in force.