

NEERAJ PAPER MARKETING LIMITED

POLICY ON PRESERVATION OF RECORDS AND ARCHIVAL POLICY

1. Preamble

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as "SEBI (LODR) Regulations" or "Regulations"] requires every listed company to have a policy on Preservation of Documents/ records maintained by the Company either in Physical Mode or Electronic Mode.

Further, Regulation 30(8) of the Listing Regulations requires the Company to frame the archival policy for website disclosures.

2. Objective

The purpose of this Policy is to ensure that all necessary documents and records of the Company are adequately protected and maintained/preserved as per the statutory and regulatory requirements. Further records of the Company which are no longer needed may be destroyed after following due process in this regard. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

3. Applicability

This Policy shall come into force with effect from 1st December 2015 and shall be applicable to all documents/records, as defined hereinafter.

4. Definitions

- (i) **"Act"** means the Companies Act, 2013, Rules framed there under and any amendments thereto;
- (ii) **"Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;
- (iii) **"Company", "This Company", "The Company", "Company"** wherever occur in the policy shall mean **"Neeraj Paper Marketing Limited"**.
- (iv) **"Board of Director" or "Board"**, means the collective body of the Directors of the company;
- (vi) **"Policy" or "This Policy"** means, "Policy on Preservation of Documents."
- (vii) **"Maintenance"** means keeping Documents, either physically or in Electronic Form.
- (viii) **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.
- (ix) **"Electronic Form"** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

- (x) **“Key Managerial Personnel”** or **“KMP”** shall have the same meaning as assigned to it under Section 2(51) of the Companies Act, 2013.
- (xi) **“Stock Exchange”** means a recognized stock exchange as defined under clause (f) of Section 2 of the Securities Contracts (Regulation) Act, 1956, on which the securities of the Company are listed for the time being.

5. Classification of Documents

Documents and Records of the Company required to be preserved under the Regulations shall be classified in the following two categories as below:

- a. “Documents to be preserved permanently” and
- b. “Documents to be preserved for not less than eight years”.

The above mentioned documents can be preserved in electronic or physical mode.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. documents that needs to be preserved and retained permanently;
- b. documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulations;

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I

6. Destruction of Records

- a. The records/documents which are preserved shall be reviewed every year and those records which are due for disposal shall be identified.
- b. At the end of the minimum period of retention, documents shall be destroyed unless they are required for any litigation, audit or similar activity.
- c. Destruction means that neither the organization nor any other party shall be able to access the document or part of it.
- d. If the organization is involved or is reasonably anticipated to be involved in any litigation, audit or similar activity by statutory or regulatory bodies, then destruction of records may be kept on hold temporarily.

7. Archival Policy

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30(8) of the Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years.

8. Custody of the documents

The official of the Company required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law. The custody of the documents shall be with the Key Managerial Persons. Where the Authorised KMP tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

9. Authority to make alterations to the Policy

The Board is authorized 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 Acts and Regulations.

10. Conversion of the form in which the documents are preserved

The Physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space. This will be done after obtaining prior approval of the Board.

11. Authenticity

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

12. Disclosure/Amendment

This policy as amended from time to time shall be made available at the website of the Company. The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

ANNEXURE I

Indicative list

A) PERMANENT PRESERVATION:

- a. Certificate of Incorporation
- b. Certificate of Commencement of Business
- c. Memorandum of Association and Article of Association as originally filed and updated from time to time
- d. Agreements made by the Company with Stock Exchanges, Depositories, Share Transfer Agents and Joint Ventures Agreements
- e. Minutes Books of General Meeting, Board and Committee Meetings as per Companies Act, 2013
- f. All the Statutory Registers require to be maintained under Companies Act, 2013
- g. Copy of PAN Card of the Company
- h. Copy of all the licenses applicable and obtained by the Company
- i. All documents and information and e-forms filed with ROC
- j. Copy of Annual Report containing Financial Statements, Directors Report, and Auditors Reports etc.
- k. Disclosure made under the SEBI Insider and Takeover Regulations and SEBI(LODR) Regulation, 2015 to the stock exchange from time to time
- l. Any other documents as may be required to maintain in terms of applicable law(s) maintained and preserved form time to time

B) TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Returns under Companies Act, 2013
- b. Attendance Register of the Board and its Committee Meetings and General Meetings whether in physical or electronic mode
- c. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- d. All notices pertaining to disclosure of interest of directors in form MBP - 1
- e. Instrument creating a charge or modification (from the date of satisfaction of charge) under Companies Act, 2013
- f. Books of accounts, financial statements etc.
- g. All disclosure made under Listing Agreement quarterly, half yearly & annually to Stock Exchanges.
- h. Any other documents as may be required to maintain in terms of applicable law(s) maintained and preserved form time to time