

# **RAJASTHAN TUBE MANUFACTURING COMPANY LIMITED**

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

- **PREAMBLE**

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), Rajasthan Tube Manufacturing Company 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. In terms of Regulation 30(8) of the Listing Regulations, the Company is required to formulate an archival policy for all disclosures of events/information to the Stock Exchanges in terms of the Company's Policy for Disclosure of Events/Information and Determining of Materiality.

- **APPLICABILITY**

This policy is applicable to all Documents maintained in physical and electronic mode by the company. The Documents not covered under this policy shall be preserved and maintained in accordance with the provisions of respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

- **OBJECTIVE OF THE POLICY**

The main objective of the policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after the following due process for the same.

The major objectives of the policy are:

- To identify statutory records to be preserved.
  - To identify records to be maintained either for a period of eight years or permanently.
  - To decide the mode of preserving the documents, whether physical form or in electronic form.
  - To decide the procedure to destroy the documents after eight years or other applicable period.
  - To help employees understanding their obligations in retaining and preserving the documents and records.
- **POLICY FOR PRESERVATION OF DOCUMENTS**
    1. Documents and Records of the Company required to be maintained under the Listing Regulations shall be classified in 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, addition, deletion or any changes made therein from time to time;

B) Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions the subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

2. The listing documents and records in physical form shall be in the custody of the Company Secretary or any authorized person.

3. The Company may keep the listing documents and records as specified above in Electronic mode.

4. The Registrar and Share Transfer Agent shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained by them and provide an annual undertaking to the Company in this regard.

- **DESTRUCTION OF DOCUMENTS**

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the concerned person. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate /irrelevant/unimportant.

It applies to both Physical and Electronic Documents.

- **DISCLOSURE/AMENDMENT**

This policy as amended from time to time shall be made available at the website of the Company at [www.rajtube.com](http://www.rajtube.com) the right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

- **ARCHIVAL POLICY**

Any Disclosure of events or information which have been submitted by the company to the stock exchange under Regulation 30 of the Listing 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 archived from the website of the Company for a period of 3 years.

**A) DOCUMENTS /RECORDS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE.**

1. Minutes book of Board, Committees and General Meeting
2. Statutory Registers as per Companies Act, 2013
3. Licenses and Permissions
4. Common Seal
5. Annual Returns
6. MOA and AOA as amended from time to time
7. Register of disposal of records
8. Statutory Forms and Disclosures except for routine compliances.
9. Bonus, Gratuity and Other Statutory Records
10. Registration Certificate
11. Register and Index of Members
12. Original Purchase and Sale Agreement/ Deeds
13. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

**B) DOCUMENTS /RECORDS TO BE PRESERVED FOR A MINIMUM PERIOD OF EIGHT YEARS**

1. Annual Return along with its Annexure
2. Board Agenda and supporting documents
3. Attendance Register- Board, Committees & General Meetings (8 years)
4. Office copies of Notice of General Meeting and related papers
5. Office copies of Notice of Board Meeting/Committee Meeting, Notes on Agenda and other related papers. (8 years)
6. All notices pertaining to disclosure of interest of directors. (8 years)
7. Instrument creating charge or modification (8 years from date of satisfaction of charge)
8. Financial Statements, Books of Accounts etc.
9. Scrutinizers' Report on Postal Ballot and AGM (8 years)
10. Register of debenture holders, if any and other security holders
11. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.