



RDB RASAYANS LIMITED

Policy on Preservation of Documents

1. Preamble and Scope

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. This Policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

The Policy shall be effective from the date when the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 become effective.

2. Objective

The objective of this Policy is to ensure that all the statutory documents/ records are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations. Further, if any other applicable law requires the preservation of any of these Listing records for a longer period or permanently, then those shall be preserved /maintained accordingly.

3. Definitions

- a) Act: "Act" means the Companies Act, 2013 including any amendment or modification thereof;
- b) Board: "Board" means Board of Directors of the Company;
- c) Company: "Company" means RDB Rasayans Limited;
- d) Current: "Current" means running matter or whatever is at present in course of passage;
- e) Documents: "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- f) Electronic Form: "Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disk, 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.
- g) Key Managerial Personnel: "Key Managerial Personnel" shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.
- h) Regulations: "Regulations" shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.



RDB RASAYANS LIMITED

- i) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

4. Classification

The Company has classified the preservation of documents to be done in the following manner:

- a) documents that need to be preserved and retained permanently;
- b) documents that need to be preserved and retained for a period of 8 years;
- c) documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d) where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "current".

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

5. Modes of Preservation

The Documents may be preserved in

- a) Physical Form; or
- b) Electronic Form

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.

The preserved documents shall be made available to all concerned employees of the Company and others not belonging to the Company, with the permission of the respective Departmental heads. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorised access.

6. Destruction of Records

Records which no longer serve useful purpose should be destroyed. This would free filing equipment for storage or records currently needed in the conduct of business. Records destruction can also improve operational efficiency by reducing the quality of records to be searched in order to locate the needed information. However, it be noted that all the confidential records shall be destructed only after the approval of the Directors of the Company.

7. Amendments to the Policy

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.



RDB RASAYANS LIMITED

ANNEXURE – A

Indicative list

A) PERMANENT PRESERVATION:

- a. Common Seal
- b. Minutes Books of Board, General Meetings and Committee Meetings
- c. Statutory Registers
- d. License and Permissions
- e. Statutory Forms and disclosures except for routine compliance
- f. Register of Members
- g. The memorandum and Articles of Association
- h. Quarterly/ half-yearly/annual compliances submitted from time to time
- i. Listing Agreement
- j. Correspondence with courts/ other statutory bodies regarding any petition/ case/ suit etc.

B) TEMPORARY PRESERVATION UPTO 8 YEARS

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register for Board, General Meetings and Committee Meetings
- d. Office copies of Notice of General Meeting, scrutinizer's report and related papers
- e. Office copies of Notice of Board Meeting/Committee Meeting, Notes on agenda and other related papers
- f. All notices pertaining to disclosure of interest of Directors
- g. Instrument creating a charge or modification
- h. Books of accounts, financial statements etc.
- i. Register of debenture holders or any other security holders
- j. Renewal, modification, termination of contract/agreement/purchase orders.

C) OTHERS

As per applicable law