



***RAJGOR CASTOR DERIVATIVES LIMITED***

**POLICY ON PRESERVATION OF DOCUMENTS**

*[Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

## **I BACKGROUND**

SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 (“**Regulations**”) require every listed company to formulate a policy on Preservation of Documents which has to be approved by the Board of Directors.

## **II OBJECTIVE OF THE POLICY**

The objective of this Policy is to classify the documents, records and registers of the Company which are required:

- (a) to be preserved permanently; and
- (b) to be preserved for a period of not less than 8 (eight) years after completion of the relevant transactions: Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.”

## **III DEFINITIONS**

“**Documents**” refers to papers, notes, agreements, notices, advertisement, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

“**Preservation**” means maintenance of Documents, files and records in usable form in good order and to prevent them from being altered, damaged or destroyed.

“**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.

## **IV CLASSIFICATION OF DOCUMENTS**

- a. Documents shall be classified in the following categories:
  - i. Mandatory under governing laws
  - ii. Non-Mandatory
- b. Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.
- c. All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
- d. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

## **V PRESERVATION OF DOCUMENTS**

- (a) The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made there under, the secretarial standards, the

listing regulations and any other law, rules, regulations as may be applicable to the Company from time to time.

- (b) The relevant head of departments of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person).
- (c) The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- (d) The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure the integrity and confidentiality of the Documents and prohibit unauthorized access.
- (e) The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

## **VI MODE OF MAINTENANCE**

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

## **VII DISPOSAL AND DESTRUCTION OF RECORDS**

After expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both physical and electronic documents. The documents may be destroyed as follows:

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

The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.

## **LIMITATION AND AMENDMENT**

In the event of any conflict between the provisions of this Policy and of the Companies Act, 2013 (and the rules framed thereunder) or the Regulations or any other statutory enactments, rules, the provisions of such Act or Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Regulations, Companies Act, 2013 (and the rules framed thereunder) and/or applicable laws in this regard shall be deemed to be covered under this Policy.

## **DISSEMINATION OF THE POLICY:**

This Policy will be communicated to all operational employees and other concerned persons of the Company and be disclosed on the Company's website i.e <https://www.rajgorcastor.com>.

\*\*\*\*\*

*This said Policy shall be effective from the date of listing of securities on stock exchange.*