

**NATIONAL STEEL AND AGRO INDUSTRIES LIMITED**

**POLICY ON PRESERVATION OF DOCUMENTS**

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## **Preamble**

National Steel and Agro Industries Limited (“the Company”), being a listed entity, is obliged to have policy on preservation of documents under and in accordance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015 (“the Regulations”).

## **Scope**

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

## **Objectives**

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

The major objectives of the policy are:

- (i) Identification of statutory registers and other records of the Company which are required to be preserved.
- (ii) Identification and categorisation of the statutory registers and other records to be maintained either for eight years or permanently.
- (iii) Decide whether the statutory records and documents are to be preserved in physical form or electronic form.

- (iv) After completion of eight years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guideline of the Policy or as decided by the Board of Directors that time.

<b>Definitions</b>
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- (i) **“Act”** means the Companies Act, 2013 and Rules made there under, as amended from time to time.
- (ii) **“Board”** or **“Board of Directors”** shall mean the Board of Directors of the Company, as may be re-constituted from time to time.
- (iii) **“Company”** means National Steel and Agro Industries Limited.
- (iv) **“Current”** means running matter or whatever is at present in course of passage.
- (v) **“Document”** includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.
- (vi) **“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.
- (vii) **“Policy”** or **“This Policy”** means Policy on Preservation of Documents.
- (viii) **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

- (ix) **“Maintenance”** means keeping documents, either physically or in electronic form.
- (x) **“Regulations” or “SEBI Regulations”** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.

### **Interpretation**

The words or expressions used but not defined in this Policy, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

### **Guidelines**

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015 provides that the listed entity shall have a policy for preservation of documents approved by its Board of Directors, classifying them in at least two categories as follows:

- (i) Documents whose preservation shall be permanent in nature; and
- (ii) Documents with preservation period of not less than eight years after completion of the relevant transaction.

Accordingly, the Company has classified the preservation of documents to be done as per the aforesaid Regulation and indicative list of documents and the time frame of their preservation is provided in Annexure.

### **Mode of Preservation**

The documents may be preserved in:

- (i) Physical Form; or
- (ii) Electronic Form

### **Destruction of Records**

The records/documents preserved shall be reviewed every year or according to need by the respective department and action be taken to destroy those records/documents which are due for disposal.

### **Review**

The Policy shall be reviewed on a periodic basis and the Chairman / Whole-time Directors and Company Secretary are authorized jointly (by any two) to make such changes as may be deemed necessary or as warranted by law.

### **Hosting of Policy on the website of the Company**

This Policy, all amendments thereto shall be hosted on the Company's website.

## Annexure

### Indicative List

**(i) Permanent Preservation:**

- (a) Common Seal
- (b) Memorandum and Articles of Association
- (c) Minutes Book of Board Meetings, General Meetings and Committee Meetings
- (d) Statutory Registers
- (e) License and Permissions
- (f) Scrutinisers' Report
- (g) Register of Members
- (h) Index of Members

**(ii) Temporary Preservation upto Eight Years:**

- (a) Annual Return
- (b) Attendance Register
- (c) Office copies of Notice of General Meeting and related papers
- (d) Office copies of Notice of Board / Committee Meeting, Notes on Agenda and other related papers
- (e) All notices pertaining to disclosure of interest of directors
- (f) Books of Accounts, financial statements etc.
- (g) Instrument creating a charge or modification

**(iii) Others**

As per applicable law.