

PRESERVATION OF DOCUMENTS POLICY

OF

MIPCO SEAMLESS RINGS (GUJARAT) LIMITED

AS PER COMPANIES ACT, 2013

POLICY ON PRESERVATION OF DOCUMENTS

1. LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities pursuant to Regulation 9 being formulate and put in place a policy for preservation of documents.

The Board of Directors of Mipco Seamless Rings (Gujarat) Limited (“the Company”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

EFFECTIVE DATE

This Policy is effective December 1, 2015

2. DEFINITIONS

A. “Board of Directors” or “Board”

Board of Directors or Board shall mean the Board of Directors of Mipco Seamless Rings (Gujarat) Limited, as constituted from time to time

B. “Company”

Company shall mean “**Mipco Seamless Rings (Gujarat) Limited**”.

C. “Documents”

Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

D. “Listing Regulations”

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”)

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories.

- I. The documents of a permanent nature (listed in **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- II. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure 2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in term of this policy.

5. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulation either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

6. 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 department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and electronic documents.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the web-site of the Company.

8. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

Documents whose preservation shall be permanent in nature

Sl.No	Nature of Document(s)
01	Registration Certificates
02	Statutory Registers required under applicable laws
03	Audited Financial Statements
04	Minutes of General Meeting
05	Minutes of Board Meeting
06	Minutes of various Committee Meetings
07	Material Agreements/ Contracts
08	Orders issued by Courts/ Statutory bodies
09	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure 2

Documents with preservation period of not less than eight years after completion of the relevant transactions.

Sl.No	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s)
03	Personnel Documents
04	Correspondence with Departments/ shareholders
05	Non- Statutory Registers/ Documents
06	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.