



## NATIONAL PLASTIC INDUSTRIES LIMITED

### Policy on Preservation of Documents and Archival of Documents on Website

*(Effective from 1<sup>st</sup> December, 2015)*

#### 1. Preface

The Board of Directors (the “Board”) of National Plastic Industries Limited (the “Company”) has adopted the following policy with regard to preservation of Documents and archival of documents on its website. This Policy has been formulated in accordance with Regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015. This Policy shall be effective from 1<sup>st</sup> December, 2015.

#### 2. Purpose and Scope

The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under Regulation 9 of Listing Regulations, 2015 and in respect of archival of documents which are hosted on the website of the Company.

#### 3. Definition:

- a. “the Company” or “Company” means “National Plastic Industries Limited”.
- b. “Board of Directors” or “Board” shall mean the Board of Directors of National Plastic Industries Limited, as constituted from time to time.
- c. “Policy” means Policy on Preservation of Documents and Archival of Documents on Website.
- d. “Documents” may include the following:
  - ‘books and papers’ as defined in clause 12 of section 2 of the Companies Act, 2013;

- 'books of accounts' as defined in clause 13 of section 2 of the Companies Act,2013;
  - 'documents' as defined in clause 36 of section 2 of the Companies Act,2013;
  - 'register of company' as defined in clause 74 of section 2 of the Companies Act,2013;
  - All papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc.
- e. "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- f. "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.

#### 4. Type of Documents and Time Period for Preservation

The company shall maintain and preserve documents as specified hereunder:

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

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

- b. The documents of the company to be maintained and preserved for 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 year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

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

#### 5. Mode of preservation

The Documents may be preserved in

- a. Physical form; or
- b. Electronic form

## **6. Public Disclosure of Documents/records and Archival of the disclosed documents/records**

All documents and disclosures uploaded on the website of the Company for the purpose of shareholder communication pursuant to any statutory/regulatory requirements, or otherwise, are the property of the Company.

Any disclosure of event/information which has been submitted to the stock exchanges under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be available on the Company's website for a period of five years from the date of it being hosted on the website. Upon expiry of a period of five years from the date of such disclosures being hosted to the website of the Company, the disclosed event or information will be archived.

All disclosed documents shall be stored in the Company's electronic archival system post the expiry of the required period of disclosure under applicable law. The archived folder would be available for a period as decided by the management of the Company.

## **7. Responsibility for preservation of documents/records**

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness tool helping the Company's and Outside legal counsel to track down documents to handle the legal cases. The respective Department Heads of the Company shall be responsible for maintenance, preservation and destroying of documents and/or its archival on the website pertaining to their departments/area of operations.

## **8. Destruction of Documents**

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

This applies to both Physical and Electronic Documents.

## **9. Amendment**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time.

## **10. Variation**

In the event of any variation or inconsistency between the provisions of the Policy and applicable law, the provisions of the applicable law shall prevail over the Policy and the provisions of the Policy shall be deemed to have been amended so as to be read in consonance with such applicable law.

*Annexure 1: Documents whose preservation shall be in permanent nature:*

Sr. No.	Record Category	Nature of Documents	Retention Period
1.	Secretarial Records	<ol style="list-style-type: none"> <li>1. All documents and Information originally filed with ROC for Incorporation/conversion/Business Commencement of Company</li> <li>2. Memorandum of Association and Articles of Association as originally filed and updated from time to time</li> <li>3. Register of Members</li> <li>4. Index of Members</li> <li>5. Various Statutory Registers pursuant to the Companies Act, 1956 and/or Companies Act, 2013</li> <li>6. Other Corporate Records (Listing Agreement, Common Seal, Minutes book of General Meetings, Board Meetings and various Committee meetings. Annual Reports originals, Adopted Policies/Codes etc.)</li> <li>7. Share Transfer, transmission etc. correspondences with the Registrar and Share Transfer Agent.</li> <li>8. Correspondences with Statutory bodies</li> </ol>	Permanent
2.	SEBI & Stock Exchange Records	<ol style="list-style-type: none"> <li>1. Quarterly/Half-yearly/Annual/Non-Quarterly/other Compliances submitted from time to time.</li> <li>2. Correspondences with Statutory bodies</li> <li>3. Disclosures in newspapers</li> </ol>	Permanent
3.	Finance Records	<ol style="list-style-type: none"> <li>1. Audited Financial Statements</li> <li>2. Auditors Report</li> </ol>	Permanent
4.	Taxation Records	<ol style="list-style-type: none"> <li>1. Registration /Amendment Certificate under various relevant provisions in force.</li> <li>2. Correspondences with Statutory bodies</li> </ol>	Permanent
5.	Legal	Correspondence with Courts/other statutory bodies regarding petition/case/suit etc.	Permanent

6.	RBI Records	<ol style="list-style-type: none"> <li>1. License Certificate / Renewal Certificate</li> <li>2. Statutory Returns/Reports etc. submitted from time to time</li> </ol>	Permanent
7.	Labour Law Records	<ol style="list-style-type: none"> <li>1. Registration/Renewal Certificates under various Acts relating to Labour Laws.</li> <li>2. Maintenance of various Registers under the Acts in force relating to Labour Laws.</li> </ol>	Permanent
8.	Property Records	<ol style="list-style-type: none"> <li>1. Agreements/Contracts</li> <li>2. Documents relating to acquisition/sale of properties</li> </ol>	Permanent
9.	Other Records	Any other documents/miscellaneous licenses/confidential agreements as may be required to maintain/obtained in terms of applicable law(s), maintained and preserved from time to time	Permanent

Annexure 2:

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

Sr. No.	Record Category	Nature of Documents	Retention Period
1.	Secretarial Records	1. Non-Statutory Registers pursuant to the Companies Act, 1956 and/or Companies Act, 2013 2. Annual Return(s) 3. Correspondences with the shareholders	8 years from the financial year in which the latest entry is made 8 years from the date of filing with the Registrar 8 years from the date the complaint is resolved
2.	Finance Records	1. Books of Accounts 2. Vouchers	8 financial years following the relevant financial year
3.	Taxation Records	1. Preservation of specific books of accounts 2. Records pertaining various other laws in force	8 financial years following the relevant financial year
4.	Contracts/Agreements/Purchase Orders	1. Renewal 2. Modification 3. Termination of: Contracts/Agreements/Purchase Order	8 years from termination of Contract/Agreement/completion of Purchase
5.	Insurance Records	1. Insurance Policy Execution/Renewal 2. Insurance Claims under various policies.	8 years from the lapse of the Policy/settlement of claim
6.	Personnel Records	Official Personnel files of inactive employees	8 years from the date of termination of employment
7.	Other Records	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time	