

JAYASWAL NECO INDUSTRIES LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

INTRODUCTION

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), the Board of Directors -of Jayaswal Neco Industries Limited has adopted this Policy at its meeting held on February 12, 2016, for Preservation of Documents.

Preservation of Documents

Regulation 9 of the Listing Regulation 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 :-

- (a) documents whose preservation shall be permanent in nature ;
- (b) documents with preservation period of not less than 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.

PURPOSE

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for weeding out the same.

APPLICABILITY

This policy is applicable to all documents pertaining to all the departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of care and confidentiality.

DEFINITIONS

1. **Board** means “Securities and Exchange Board of India.”
2. **Company** means Jayaswal Neco Industries Limited
3. **Documents** means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.
4. **Listing Regulations** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

POLICY

a) Legislative framework and standards

- The Companies Act, 2013
- The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- The Companies (Preservation and Disposal of Records) Rules, 1966

b) Creation of Documents

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should:

- i. facilitate necessary action by employees and their successors at any level at all points of time;
- ii. facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- iii. protect the financial, legal and other rights of the organisation, its clients and any other people affected by its actions and decisions.

c) Maintenance of Documents

Every employee or person who is associated with the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

- Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitised in business processes.
- Physical documents to be maintained in books and files.
- All digital and physical records to be saved at the registered office of the Company and no physical records can be migrated without permission of the respective Department Head.
- A reproduction of any original record on microfilm or on any other medium shall be certified by the respective Head of Department of the Company to be a true and accurate reproduction of the original of such document.

d) Preservation, Disposal and Destruction of Documents

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

- a. documents that needs to be preserved and retained permanently;

- b. documents that needs 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".

The Indicative List of documents in (a) or (b) or (c) above is given in **Annexure A**.

The documents as mentioned in (b) and (c) may be destroyed after the specified period.

Provided 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 Department Head for the purpose. Inspection of this register is restricted. The format of Register is provided in **Annexure B**.

e) Disclosure

This Policy has been approved by the Board of Directors of the Company at their meeting held on 12th February 2016 and shall be disclosed to the Stock Exchange(s) and also posted on the website of the Company www.necoindia.com.

f) Policy Review

This policy shall be reviewed from time to time so that the policy remains in consonance with applicable legal requirements.

g) Disclaimer

In the event that any term, condition or provision of this Policy being held to be a violation of any applicable law, statute or regulation, the same shall be severable from the rest of this Policy and shall be of no force and effect, and this Policy shall remain in full force and effect as if such term, condition or provision had not originally been contained in this Policy.

ANNEXURE A

Indicative list of Documents

A) PERMANENT PRESERVATION:

- a. Minutes books of Board, General Meetings and Committee Meetings
- b. Statutory Registers
- c. License and Permissions
- d. Statutory Forms and disclosures except for routine compliance
- e. Scrutinizers' Reports
- e. Register of Members
- g. Index of Members

B) TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting 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

C) OTHERS:

- a. Other Statutory Records - As per applicable laws.

ANNEXURE – B

PARTICULARS OF DOCUMENT	DATE OF DESTRUCTION OF DOCUMENT	INITIALS OF THE AUTHORISED PERSON