

**RAC EXTRUSIONS LIMITED**  
**CIN: U13100DL1996PLC078209**  
**POLICY FOR PRESERVATION OF DOCUMENTS**

## **Policy for preservation of documents**

### **Background:**

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") requires every listed company to formulate a policy on preservation of company documents which shall be approved by the Board of Directors.

Thus this policy ("Policy") is framed with an objective of classifying various records, registers, returns for the purpose of such maintenance and preservation as prescribed.

Any director of **RAC Extrusions Limited** ("RAC" or the "Company") or the company secretary of the Company is authorised to make such alteration to this Policy as considered appropriate, however, subject to the condition that such alteration shall be approved by the board of directors the Company in consonance with applicable law including the provisions of the Companies Act, 2013 ("Act") and Listing Regulations.

In case any of the provisions of this Policy are inconsistent with the Act or Listing Regulations, the provisions of the Act and/ or Listing Regulations will prevail over this Policy and the provisions in the Policy will be modified in due course to make it consistent with applicable law.

### **Preservation of Documents:**

- A. The documents of a permanent nature (listed in Annexure 1) which 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.

- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure 2) which 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.

**Roles & Responsibilities:**

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of functions falling under the charge of each of them, in terms of this Policy.

Where a particular authorised person tenders his/ her resignation or is transferred from one location of the Company to another, such person shall, before such resignation or transfer becoming effective, hand over, to his/ her successor, all the relevant documents (whether in electronic form or otherwise) in his custody pursuant to this Policy together with any relevant passwords, lock and key, and any devices in his/ her possession used to store such documents.

**Authenticity:**

Where a document is being maintained both in physical form and electronic form, the authenticity with reference to the physical form should be considered for every purpose.

**Destruction of Documents:**

The documents specified in Annexure 2 which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period (as set out in Annexure 2) in such mode and under the instructions approved by the Functional/ Departmental Heads.

**Dissemination of the Policy:**

The approved Policy shall be uploaded on the Company's website. Suspension of documents disposal in the event of litigation/claims: In the event the Company is served with any notice for documents from any of the statutory authorities or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of such notice or litigation shall be suspended until such time the matter is settled, resolved or disposed off. The relevant authorised person shall be responsible for informing all relevant employees of the Company about suspension of further disposal of documents.

**General:**

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

**Review of Policy:**

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this Policy shall be approved by the Managing Director and Chief Executive Officer of the Company as delegated by the Board of Directors of the Company.

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

No.	Document
1.	Incorporation documents
2.	Memorandum and articles of association
3.	Register of members along with the index
4.	Register of sweat equity shares
5.	Register of directors and key managerial personnel
6.	Register of renewed and duplicate share certificates
7.	Register of employee stock option
8.	Register and index of beneficial owners
9.	Register of shares or other securities that have been bought back
10.	Share certificate forms and related books and documents - disputed cases
11.	Register of charges
12.	Register of loans, guarantees, security and acquisition
13.	Register of investments made by the Company not held in its name
14.	Register of contracts or arrangements in which directors are interested
15.	Foreign register of members
16.	Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board, creditors, committees of the Board and resolutions passed by circulation
17.	Register of transfer and transmission of shares
18.	Statutory Clearances, Annual Returns, Assessment Orders, Loan Documents, Security Documents, Guarantee Documents, Investment Documents, Management Consultancy Agreements, Stock Exchange Listing Permissions etc.
19.	Forms and returns filed with the Registrar of Companies, Ministry of Corporate Affairs, SEBI or any other regulatory authority
20.	Any court/ NCLT orders
21.	Certificates issued by the Registrar of Companies
22.	Other statutory registers and documents maintained by the

	Company under various laws applicable to the Company or as prescribed by the Board from time to time.
--	---

## Annexure 2

### Documents with preservation period of not less than eight years after completion of relevant Transaction

No.	Documents
1.	Books of account including relevant books and papers and financial statements
2.	Disclosures/ notices by a director of his interest
3.	Register of deposits
4.	Instrument creating a charge or modification
5.	Annual return and copies of all certificates and documents required to be annexed thereto
6.	Register of debenture holders
7.	Postal ballot forms
8.	Correspondence with shareholders
9.	Tax records
10.	Disclosures - SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
11.	Disclosures - SEBI (Prohibition of Insider Trading) Regulations, 2015
12.	Protected Disclosures in writing or documented along with the results of investigation relating thereto (including the Investigation Report) as reported under the whistleblower policy
13.	Other statutory registers and documents maintained by the Company under various laws applicable to the Company or as prescribed by the Board from time to time.