



ROYAL INDIA CORPORATION LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

(With effective from December 01, 2015)

Preamble:

The Securities and Exchange Board of India (SEBI) vide its notification dated September 02, 2015 has notified Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. These regulations shall come into effect on the 90th day from the date of their publications in the official gazette i.e. December 01, 2015 (except regulations 23 (4) and 31A which shall come into force with immediate effect i.e. September 02, 2015 i.e. date of notification).

The Board of Directors of the Company has approved the following policy of the Company for preservation of Documents/Records maintained by the Company either in physical mode or in electronic mode. This policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (LODR), Regulations, 2015.

Regulation 9 of Securities and Exchange Board of India (LODR), Regulations, 2015 aforesaid Regulations requires the Board of Directors of the Company to frame a policy for Preservation of Documents classifying them in to two categories:

- i. Documents whose preservation shall be in permanent nature; and*
- ii. 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.

Definitions:

In this policy, unless the context otherwise requires:

- “Company” means Royal India Corporation Limited.
- “Board” means Board of Directors of the Company.
- “Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements), Regulations, 2015.
- “Preservation” means to keep in good order, to prevent from being damaged or destroyed.
- “Register” means a register maintained under the Companies Act, 2013 and under SEBI Act.



- “Applicable Law” means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA) , The Institute of Company Secretaries of India (ICSI) and other professional bodies under which the preservation of documents has been prescribed.
- “Books of Accounts” includes records maintained in respect of-
 - i. All sums of money received and expended by the Company and matters in relation to which the receipt and expenditure take place.
 - ii. All sales and purchases of goods and services by the Company.
 - iii. The assets and liabilities of the Company; and
 - iv. The items of costs as may be prescribed under Section 148 of the Act in case the Company belongs to any class of companies specified under that section.
- “Documents” refers to papers, notes, agreements, notices, agenda, circulars, advertisement, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any applicable law, whether issued, sent, received 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.
- “Electronic Form” means any electronic device as servers, computer, laptop, compact disc, floppy disc, pen drive, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control the Company or otherwise the Company has control over access to it.
- “SEBI LODR” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Purpose and Scope:

This policy is framed keeping in view the requirements of Regulations 9 of SEBI (LODR), Regulations, 2015. The Company is required to preserve documents of the Company. 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 discarding the same. The Policy is also for the purpose of aiding employee of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.



Roles & Responsibility:

The respective functional / departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

Destruction of Documents:

The Documents specified in “Annex-A” which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional / Departmental heads. Any deviation will be approved by the Chief Financial Officer.

Periodical Review of the Policy by the Board of Directors:

This policy shall be reviewed periodically by the Board and amendments affected subject to approval of the Board if and when practical difficulties are encountered. The Board may also review this policy on document retention to comply with any local, state, and central legislation that may be promulgated from time to time.

Dissemination of the Policy:

The approved policy shall be uploaded on the Company’s website, www.ricl.in

Policy Review:

This policy is framed based on the requirements of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements), Regulations, 2015.

In case of any subsequent changes in the Companies Act, 2013 or regulations which makes any of the provisions of the Act or Regulations would prevail over the Policy and the provisions in this Policy would be modified in due course to make it consistent with law.



"ANNEX-A"

A	CORPORATE RECORDS
Sr. No.	Record Type
DOCUMENTS TO BE RETAINED PERMANENTLY	
1.	Common Seal.
2.	Certificate of Incorporation.
3.	Memorandum and Articles of Association.
4.	Minutes of Board and Committee Meetings, Shareholders' Meetings.
5.	Register and Index of Members.
6.	Register of investments in securities not held in the name of the Company.
7.	Register of renewed and duplicate certificates.
8.	Register of contracts in which Directors are interested.
9.	Register of Directors, Managing Director, Manager and Secretary.
10.	Register of Directors' Shareholding.
11.	Register of Inter-corporate loans and investments.
12.	Register of transfer of shares.
13.	Register of Transmission of shares.
14.	Listing Agreement executed with the stock exchanges.
15.	Key Corporate Policies.
16.	Statutory Forms except for routine Compliances.
17.	Disclosure received under SEBI (Insider Trading) Regulations, 2015 & Code of Conduct.



DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS	
18.	Statutory forms except for routine compliance to be filed with Registrar of Companies (ROC) (from the filing with the ROC).
19.	Board /Committee meeting Agenda and supporting documents.
20.	Attendance Register.
21.	Notices pertaining to disclosure of Interest by the Directors.
22.	Annual Returns.
23.	Correspondence with shareholders.
24.	Disclosures under SEBI – Substantial Acquisition of shares and Takeovers, Regulations.
25.	Disclosures under SEBI – Prohibition of Insider Trading Regulations.
26.	Postal Ballot forms.
27.	Scrutinizer’s Reports on voting at General Meetings/ Postal Ballot.
28.	Newspaper cuttings of notices of Board Meeting and Financial Results.
29.	Index and Register of Debenture shareholder, if any. (8 years after the redemption of debentures)

B.	LEGAL RECORDS
Sr. No.	Record Type
DOCUMENTS TO BE RETAINED PERMANENTLY	
1.	Court Orders.



C.	ACCOUNTS & FINANCE
Sr. No.	Record Type
DOCUMENTS TO BE RETAINED PERMANENTLY	
1.	Annual Audit Reports and Financial Statements.
DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS	
2.	Books of Accounts, Ledgers & Vouchers.
3.	Investment Records.
4.	Engagement letters from Auditors.

D.	TAX RECORDS	
Sr. No.	Record Type	Preservation Period
1.	Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return.	8 years from the end of the financial year or completion assessment or appeal under the applicable law is over whichever is later.
2.	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax	8 years from the end of the financial year or completion assessment or appeal under the applicable law is over whichever is later.