

**BHORUKA ALUMINIUM LIMITED**

**POLICY ON PRESERVATION OF DOCUMENTS**

**PREFACE**

A Policy on Preservation of Documents will ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding surplus inventory of Documents. *Bhoruka Aluminium Limited* (the Company), therefore, formulates this policy, in pursuance to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), for preservation of the Documents to aid the employees 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.

**SCOPE**

This policy is applicable to all departments of the Company. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

**DEFINITIONS**

**"Company"** means Bhoruka Aluminium Limited.

**"Board of Directors" or "Board"** means the Board of Directors of Bhoruka Aluminium Limited, as constituted from time to time.

**"Current Document"** means any document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

**"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.

**"Electronic Record(s)"** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

**"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.

**"Policy"** means policy on preservation of documents.

**"Listing Regulations"** means the Securities and Exchange Board of India (Listing Obligations and Disclosure requirements) Regulations, 2015.

## **CLASSIFICATION**

**"Annexure A"** is an indicative list of the Documents and time frame of their maintenance, preservation and disposal of the documents.

The Authorised Person is authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with applicable laws or regulations and monitor compliance with this Policy.

## **MODES OF MAINTENANCE**

The Documents may be preserved in

- a. Physical form and / or
- b. Electronic form.

The officer of the Company required to preserve the Document shall be Authorized Person.

The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which risks the content, authenticity, utility or accessibility of the Documents.

The preserved Documents must be accessible at all reasonable times.

## **DISPOSAL AND DISTRUCTION OF DOCUMENTS**

All the documents mentioned in Annexure A to this Policy, which are preserved temporarily and after expiry of the specified time the documents can be destroyed. This applies to both Physical and Electronic Documents. A register of Documents disposed/destroyed shall be maintained as per **"Annexure B"** and all entries made therein shall be authenticated by the Authorized Person.

## **AMENDMENTS**

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

**ANNEXURE A****Indicative list of documents:****1. Companies Act, 2013**

<b>TEMPORARY PRESERVATION</b>	<b>PERMANENT PRESERVATION</b>
<ul style="list-style-type: none"> <li>• Annual Returns – 8 years from the date of filing with MCA</li> <li>• All notices pertaining to disclosure of interest of directors – 8 years from the end of financial year to which it relates</li> <li>• Books of Accounts – 8 financial years prior to current financial year</li> <li>• Register of deposits - not less than 8 years from the date of last entry</li> <li>• Instrument creating a charge or modification - 8 years from date of satisfaction of charge</li> <li>• Register of debenture holders or any other security holders, if any - 8 years from the date of redemption of debentures or securities</li> <li>• Foreign register of debenture holders or any other security holders - 8 years from the date of Redemption</li> <li>• All books and documents relating to the issue of share certificates, including the blank forms of share certificates – not less than 30 years and in case of disputed cases, shall be preserved permanently</li> </ul>	<ul style="list-style-type: none"> <li>• Certificate of Incorporation</li> <li>• Certificate of change of name</li> <li>• Memorandum and Articles of Association as amended from time to time</li> <li>• Minute books of Board and Committee meetings</li> <li>• Minute books of General Meetings</li> <li>• Register of members</li> <li>• Index of members</li> <li>• Register of Charges, if any</li> <li>• Register of Loans, guarantee, security and acquisition made by the Company</li> <li>• Register of investments held in its name by the Company</li> <li>• Register of contracts in which directors are interested</li> <li>• Register of Renewed and Duplicate share certificates</li> </ul>

**2. Accounts and Finance related Documents**

<b>TEMPORARY PRESERVATION</b>	<b>PERMANENT PRESERVATION</b>
<ul style="list-style-type: none"> <li>• Annual Audit Records and Financial Statements – 8 years after completion of</li> </ul>	<ul style="list-style-type: none"> <li>• Annual Audit Reports and Financial Statements, Tax and Vat Audit</li> </ul>

audit <ul style="list-style-type: none"> <li>• Annual Plans and Budgets – 8 years after completion of Audit</li> <li>• Bank Statement and Cancelled Cheques – 8 years</li> <li>• Employee Expense Records – 8 years</li> <li>• Bank Account passbook or statement, Bank Reconciliation Statement – 8 years</li> </ul>	<ul style="list-style-type: none"> <li>• General Ledger</li> <li>• Investment Records</li> <li>• Fixed Asset Register with supporting Purchase Orders and Bills for fixed assets addition</li> <li>• Tax Litigation documents</li> <li>• Bill of entries</li> </ul>
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**3. Insurance Records**

<b>TEMPORARY PRESERVATION</b>	<b>PERMANENT PRESERVATION</b>
<ul style="list-style-type: none"> <li>• Annual Loss Summaries – 8 years</li> <li>• Audits and Adjustments – 8 years</li> </ul>	<ul style="list-style-type: none"> <li>• Claim Files</li> <li>• Insurance Policies for the Companies</li> <li>• Releases and Settlements</li> </ul>

**4. Tax Records**

<b>TEMPORARY PRESERVATION</b>	<b>PERMANENT PRESERVATION</b>
<ul style="list-style-type: none"> <li>• Tax Bills, Receipts, Statements – 8 years</li> <li>• Sales Tax Records – 8 years</li> </ul>	<ul style="list-style-type: none"> <li>• Tax exemption documents and related correspondence</li> <li>• Tax Returns</li> </ul>

**5. Contracts entered into by the Company including Marketing Records**

<b>TEMPORARY PRESERVATION</b>
<ul style="list-style-type: none"> <li>• Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents – 8 years)</li> </ul>

**6. Legal Files and Records**

<b>TEMPORARY PRESERVATION</b>	<b>PERMANENT PRESERVATION</b>
<ul style="list-style-type: none"><li>• Legal Opinions – 8 years after closure of the matter</li><li>• Litigation files – 8 years after expiration of disposal of the case</li></ul>	<ul style="list-style-type: none"><li>• Court Orders</li></ul>

**7. Property Records**

<b>PERMANENT PRESERVATION</b>
<ul style="list-style-type: none"><li>• Correspondence, Property Deeds, Assessments, Licenses, Rights of Way</li><li>• Original Purchase/ Sales Deeds</li><li>• Property Insurance</li><li>• Property Card, Index II, Ownership records issued by Government Authority</li></ul>

Any other document(s) as may be required to maintain in terms of applicable law(s) or regulation(s) for the time being in force, maintained and preserved from time to time.

**ANNEXURE B**

**The format of the register of Documents disposed/destroyed:**

<b>Sl. No.</b>	<b>Particulars of documents disposed/ destroyed</b>	<b>Date and Mode of disposal/ destruction</b>	<b>Initials of the Authorised Person</b>

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