

RESURGERE MINES & MINERALS INDIA LIMITED

Policy on preservation of documents

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RESURGERE MINES & MINERALS INDIA LIMITED

1. PREMABLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as "SEBI (LODR) Regulations" or "Regulations"] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical mode or Electronic Mode.

2. SCOPE

The Policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVES OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The major objectives of the policy are:

- Identification of statutory registers and other records of the Company which are required to be preserved.
- Identification and categorisation of the statutory registers and other records to be maintained either for eight years or permanently.
- Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- After completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

4. DEFINITIONS

"Act" means the Companies Act, 2013, Rules framed there under and any amendments thereto.

"Regulations" means The Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 and amendments thereto.

"Company", "This Company", "The Company", "Company", "Resurgere", wherever occur in the policy shall mean "Resurgere Mines & Minerals India Limited".

"Current" means running matter or whatever is at present in course of passage.

"Board of Director" or "Board", means the collective body of the Directors of the Company.

"Policy" or "This Policy" means, "Policy on Preservation of Documents."

"Maintenance" means keeping Documents, either physically or in Electronic Form.

"Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.

"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.

"Applicable Law" means any law, rules, circulars, guidelines or standards under which the preservation of the Documents has been prescribed including any amendments thereto

"Authorized Person" means any person duly Authorized by the Board, Managing Director, Executive Director and / or Company Secretary of the Company.

“**Current Document(s)**” means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

“**Document(s)**” refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record/s, 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 / print form or in Electronic Form and does not include multiple or identical copies.

“**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.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

5. **INTERPRETATION**

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Rules framed there under, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

6. **GUIDELINES**

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, 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 –

- Documents whose preservation shall be permanent in nature;
- Documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, 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 need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 Rules framed there under and / or SEBI (LODR) Regulations and any amendments thereto.
- 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 documents pertains to a matter which is “Current”.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure – A.

7. **MODE OF PRESERVATION**

The Documents may be preserved in

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

The official of the Company is required to preserve the Document shall be Authorized Person who is generally expected to observe the compliance of statutory requirements of Applicable Law.

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

The preserved Documents must be accessible at all reasonable times. Access may be controlled by concerned Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

8. DESTRUCTION OF DOCUMENTS

The documents of the Company which are no longer required as per the time schedule prescribed in the Annexure – A, may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under Annexure – A. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at Annexure B. The entries in the register shall be authenticated by the Authorised Person.

9. POLICY REVIEW

The policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy undated as per applicable statutory guidelines.

ANNEXURE – A

Indicative List

A) PERMANENT PRESERVATION:

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

B) TEMPORARY PERSERVATION 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

As per applicable law.

ANNEXURE - B

Specimen format of the register of Documents disposed / destroyed -

Particulars of document along with provisions of applicable law	Date and mode of destruction	Initials of the Authorized person
