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| POLICY REFERENCE | Policy for preservation of documents under Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements), Regulations, 2015 (SEBI Listing Regulations) |
| POLICY OWNER | SECRETARIAL DEPT. |

| VERSION NUMBER | DATE OF INTRODUCTION | APPROVED BY | DESCRIPTION |
|-----------------------|-----------------------------|--------------------|--|
| 1 | 13.01.2016 | Board | Policy for preservation of documents under SEBI Listing Regulations |

POLICY FOR PRESERVATION OF DOCUMENTS UNDER SEBI LISTING OBLIGATIONS

PREAMBLE:

This policy attempts to preserve and maintain documents of the organization. During the course of business, the Company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organization. In order to preserve such documents, the Company needs to implement a well-considered, well-documented plan to ensure that they remain in good condition over a period of time.

PURPOSE OF THE POLICY:

The purpose of this policy is to establish the framework needed for effective management of the documents in the Company (“Neil Industries Limited”) and set principles for Company’s approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company’s commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents.

This policy seeks to ensure that the Company’s business is adequately documented that are then managed in accordance with best practice.

Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

POLICY:

a) LEGISLATIVE FRAMEWORK AND STANDARDS

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

b) DOCUMENT MAINTENANCE

The respective departments of the Company will be 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 will be responsible for any damage or defect in the concerned documents and will have to preserve them with utmost care so that they are not damaged before their preservation date. Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitized 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.

C) PRESERVATION OF DOCUMENTS (METHODS):

All documents mentioned in Category A which are temporary in nature must be preserved for a period of not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records may be at the option of the Board be destroyed. However, all the documents mentioned in Category B need to be permanently preserved by the Company during its life time. The Company Secretary of the Company shall be responsible for ensuring that the files are preserved well.

| Sr. No. | Category A (Preservation for a period of 8 years) | Category B (whose preservation shall be permanent) |
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| 1. | PROXY FORMS | CERTIFICATE OF INCORPORATION |
| 2. | REPRESENTATION LETTERS | CERTIFICATE OF CHANGE OF NAME (IF ANY) |
| 3. | STATUTORY REGISTERS MAINTAINED UNDER COMPANIES ACT 2013 | MEMORANDUM AND ARTICLES OF ASSOCIATION OF COMPANY |
| 4. | RESOLUTIONS | SHARE CERTIFICATES IN PHYSICAL FORM |
| 5. | ANNUAL REPORTS | CENTRAL GOVERNMENT APPROVALS |
| 6. | CONSENT & RESIGNATION LETTERS AS RECEIVED FROM THE DIRECTORS | |
| 7. | NSDL/CDSL FILES | |
| 8. | ANNUAL FINANCIAL STATEMENTS INCLUDING: ANNUAL ACCOUNTS DIRECTOR'S REPORT &AUDITOR'S REPORT | |

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| 9. | MINUTES BOOK | |
| 10. | DECLARATION BY DIRECTORS UNDER SECTION 184 OF THE COMPANIES ACT 2013 | |
| 12. | ALL DOCUMENTS UNDER LISTING OBLIGATIONS | |
| 13. | NOTICE OF GENERAL MEETING AND BOARD MEETING | |
| 14. | DOCUMENTS ON WHICH COMMON SEAL OF THE COMPANY IS AFFIXED | |
| | ADVERTISEMENT PUBLISHED | |
| 16. | DISCLOSURES UNDER TAKEOVER CODE | |
| 17. | OTHER SECRETARIAL COMPLIANCES | |

D) REVIEW / AMENDMENTS TO POLICY:

The policy would be reviewed by the Board of Directors. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors. However, the amended regulatory requirements will supersede the existing Policy till the time Policy is suitably amended.
