

NAGA DHUNSERI GROUP LIMITED

CIN L01132WB1918PLC003029

Policy on Preservation of Documents

A. Purpose

The Preservation of Documents Policy provides a comprehensive statement of how Naga Dhunseri Group Limited (the Company) intends to preserve and continue to make accessible the documents required. It is a broad range policy dealing with all aspects of preservation. The purpose of this policy is to establish a set of principles to guide the Company's approach to the preservation of documents. Documents must be properly preserved in a secured manner so that they survive in authentic and accessible manner over a period of time or forever, in the case of permanent documents.

This policy has been developed in response to:

- Obligations under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBILODR), vide its Chapter III Regulation 9.

B. Scope

This policy applies to all documents in connection with preservation activities of the Company, including:

- Preservation of documents that are identified permanent, and
- Preservation of documents in electronic mode
- Preservation of documents for a specified period

Documents for preservation shall be classified into three categories namely, (1) preservation of documents being permanent in nature, (2) preservation of documents being not less than 8 years after the completion of the relevant transaction and (3) preservation of documents to be kept in electronic mode.

This policy operates in conjunction with other recordkeeping policies, standards and guidance issued by various regulatory authorities.

C. Policy

The policy involves storage and protection procedures for any type and form of documents in the following manner:

1. Specialization of document storage areas for files storage, recovery and confidentiality.
2. Specialization of appropriate long-term storage space for all types of documents.

3. Setting a scheduled plan of periodic control and maintenance of the environmental conditions of the building and documents storage space.
4. Maintaining the cleanliness and maintenance of documents.
5. Setting appropriate safety, security and environment related instructions and following up their application under optimum storage and document protection conditions.
6. Securing storages space by implementing an access and exit control system to avoid document leakage and eventually loss.
7. Setting an emergency plan to face disasters
8. Developing procedures and plans for users to avoid any risk or damage of documents.
9. Ensuring that all standard specification and security conditions are in place when using documents.
10. Documents kept in electronic mode should be routinely monitored in order to identify any formats that are at risk of obsolescence. Migration of records should be planned, quality controlled and documented.

D. Responsibilities

The preservation of documents is a shared responsibility. All the departmental heads have a role to play in ensuring that documents remain authentic, accessible and useable over time.

The **Chief Financial Officer** of the Company has a duty to ensure that:

- All the documents relating to preparation and finalisation of accounts, statutory audit, direct and indirect taxes, commercial taxes and related matters are kept as per applicable regulations.

The **Company Secretary** has a duty to ensure that:

- All the documents relating to meetings of shareholders, meetings of Board of Directors and Committees thereof, Statutory Records under Companies Act, 2013, Securities and Exchange Board of India Act, 1992 and regulations made thereunder, Listing Agreement and related matters, common seal are kept as per applicable regulations.

The **Head of Human Resource Department** has a duty to ensure that:

- All the documents relating to employees and related matters are kept as per applicable regulations.

E. Effective

This policy will become effective from 1st December, 2015.

F. Monitoring and Review of Policy

This policy will be communicated to all staff and made publicly available. All staff will have a responsibility to implement preservation policies. The Company will review this policy from time to time.

This policy for preservation of documents has been approved by the Board of Directors of the Company at its meeting held on 9th November, 2015