



Policy on Preservation of Documents of Bharat Wire Ropes Limited

[Under Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015].

POLICY FOR PRESERVATION OF DOCUMENTS

Background:

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR Regulation**”) imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

The Board of Directors of Bharat Wire Ropes Limited (“**Company**”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the LODR Regulations.

Definitions:

“**Board of Directors**” or “**Board**” shall mean the Board of Directors of Bharat Wire Ropes Limited, as constituted from time to time.

“**Company**” shall mean “Bharat Wire Ropes Limited”.

“**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

“**LODR Regulations**” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Secretarial Standards**” shall mean Secretarial Standards on meetings of the Board of Directors (“SS-1”) and General Meetings (“SS-2”) issued by the Institute of Company Secretaries of India (ICSI) and approved by the Central Government under section 118(10) of the Companies Act, 2013 vide Ministry of Corporate Affairs letter No. 1/3/2014-CL.I dated June 14, 2017 and any other Secretarial Standards that may be approved by MCA in future and any amendments thereto.

“**Maintenance**” means keeping documents, either physically or in electronic form.

“**Policy**” means Policy for Preservation of Documents.

Period of Preservation:

This policy sets the standards for managing, storing and preservation of documents of the Company period of which can be broadly classified in the following three categories:

1. The documents of a permanent nature shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

The list of Documents whose preservation shall be permanent in nature are listed in “*Annexure – I*”.

2. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than 8 (Eight) years.

The list of Documents which shall be preserved for the term not less than 8 (Eight) years are listed in “*Annexure – II*”

3. The documents which needs to be preserved under Secretarial Standards shall be maintained and preserved by the Company for the term not less than three years after completion of the relevant transactions a subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than 3 (Three) years.

The list of Documents which shall be preserved for the term not less than 3 (Three) years are listed in “*Annexure – III*”

Provided further that the Company may keep the documents as specified above in an electronic mode.

Roles & Responsibilities:

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

General:

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations/secretarial standards either existing or arising out of any amendments to such laws/regulations/ secretarial standards or otherwise applicable to the Company, from time to time.

Destruction of Documents:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

Communication and Dissemination of the Policy:

This Policy shall be disclosed on the Company website.

Amendments:

The Board may subject to the applicable laws 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 the applicable provisions of any law for the time being in force.

Annexure – I**Documents whose preservation shall be permanent in nature**

Sr. No.	Nature of Documents
1.	Registration Certificates.
2.	Licenses & Statutory Approvals.
3.	Statutory Registers required under applicable laws.
4.	Audited financial statements.
5.	Minutes of General Meeting.
6.	Minutes of Board Meeting.
7.	Minutes of various Committee Meetings.
8.	Material Agreements/Contracts.
9.	Orders issued by Courts/Statutory bodies.
10.	Investment Documents/proofs including certificates etc.
11.	Insurance Policies/ Claims under various policies.
12.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure - II

Documents with preservation period of not less than eight years after completion of the relevant transactions

Sr. No.	Nature of Documents
1.	E-mails.
2.	Books of Accounts.
3.	Annual Return(s).
4.	HR & Personnel Documents.
5.	Correspondences with Government Departments/shareholders.
6.	Non-Statutory Registers/Documents.
7.	Films, Videos, etc.
8.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

Annexure - III

Documents with preservation period of not less than three years after completion of the relevant transactions

Sr. No.	Nature of Documents
1.	Proof of sending and delivery of Notice / Agenda and Notes on Agenda / draft Minutes / signed Minutes of Board Meetings and Committee Meetings.
2.	Proof of sending the Notice of the General Meeting to the Members through e-mail as required under SS-2.
3.	Any other document as may be required to be maintained in terms of applicable law(s), maintained and preserved from time to time.