



MANGALORE REFINERY AND PETROCHEMICALS LIMITED

(A Subsidiary of Oil and Natural Gas Corporation Limited)

CIN: L23209KA1988GOI008959

POLICY FOR PRESERVATION OF DOCUMENTS/ RECORDS

1.0 PREAMBLE:

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) requires the Company to formulate a policy for preservation of document/ records to identify documents that need to be maintained, preserved and disposed.

The policy for preservation of document/ records has been aligned with the provisions of the with Companies (Preservation and Disposal of Records) Rules, 1966. The policy for preservation of document/ records shall come into effect from 1st December, 2015.

2.0 DEFINITION OF DOCUMENT/RECORD:

The term “document” includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act, 2013 and rules made thereunder, maintained on paper or in electronic form; pursuant to section 2 (36) of the Companies Act, 2013.

“records” means any register, index, agreement, memorandum, minutes or any other document required by the Act or the rules made there under to be kept by a company pursuant to rule 27 of the Companies (Management and Administration) Rules, 2014 .

3.0 PRESERVATION OF DOCUMENTS.

3.1 Documents to be preserved permanently. - The following documents shall be preserved permanently, namely :-

Sl. no.	Section/ Rules	Description of document	Format	Place of maintaining document
1.	Section 7(4) of the Companies Act, 2013	Incorporation documents and		Registered Office

	read with Rule	information as originally filed with ROC.		
2.	Rule 6(3) of the Companies (Share Capital and Debentures) Rules, 2014.	Register of Renewed and Duplicate Share Certificates	Form no. SH-2	Registered Office of the company /Registrars & Transfer Agent of the company
3.	Section 85 of the Companies Act,2013 read with Rule 10 (4) of the Companies(Registration of Charges) Rules, 2014	Register of charges	Form no. CHG-7	Registered Office
4.	Rule 5 (2) and 15 (1) of the Companies (Management and Administration) Rules, 2014	Register of Members including an index of the names	Form no. MGT-1	Registrars & Transfer Agent of the company
5.	Rule 5 (2) and 15 (4) of the Companies (Management and Administration) Rules, 2014	foreign register of members	Form no. MGT-3	Registrars & Transfer Agent of the company
6.	Rule 25 (1)(e) of the Companies (Management and Administration) Rules, 2014	Minutes books of General Meeting,	-	Registered Office
7.	Rule 25 (1)(f) of the Companies	Minutes books of Board Meeting and	-	Registered Office or such place as Board may decide

	(Management and Administration) Rules, 2014	Committee Meetings		
8.	Section 186(9) of the Companies Act,2013 read with Rule 12(1] & (3) of the Companies (Meetings of Board and its Powers) Rules, 2014.	Register of loans, guarantee, security and acquisition made by the company	Form no. MBP-2	Registered Office of the company and shall be kept in the custody of the company secretary of the company.
9.	Section 187(3) of the Companies Act,2013 read with Rule 14(1) & (3) of the Companies(Meetings of Board and its Powers) Rules, 2014.	Register of investments not held in its own name by the company	Form no. MBP-3	Registered Office of the company and shall be kept in the custody of the company secretary of the company.
10.	Section 189(2) of the Companies Act,2013 read with Rule 16(1) &(3_ of the Companies(Meetings of Board and its Powers) Rules, 2014	Register of contracts with related party and contracts and Bodies etc. in which directors are interested	Form no. MBP-4	Registered Office of the company and shall be kept in the custody of the company secretary of the company.

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

Sl. no.	Section/ Rules	Description of document	Format	Time Limit for preservation	Place of maintaining document
1.	Rule 14 (3) of the Companies(Acceptance of Deposits) Rules, 2014	Registers of deposits	-	Period of not less than 8 years from the financial year	Registered Office

				in which the latest entry is made in the register	
2.	Section 85 of the Companies Act,2013 read with Rule 10 (4) of the Companies(Registration of Charges) Rules, 2014	The instrument creating a charge or modification	-	Period of 8 years from the date of satisfaction of charge by the company	Registered Office
3.	Rule 5 (2) and 15 (2) of the Companies (Management and Administration) Rules, 2014	Register of debenture-holders including an index of the names	Form no. MGT-2	Period of 8 years from the date of redemption of debentures or securities, as the case may be, and shall be kept in the custody of the company secretary of the company or any other person authorized by the Board for such purpose	Registered Office of the company /Registrars & Transfer Agent of the company
4.	Rule 5 (2) and 15 (2) of the Companies (Management and Administration) Rules, 2014	foreign register of debenture-holder	Form no. MGT-3	Period of 8 years from the date of redemption of debentures or securities, as the case may be, and shall be kept in	Registered Office of the company /Registrars & Transfer Agent of the company

				the custody of the company secretary of the company or any other person authorized by the Board for such purpose	
5.	Section 94 of the Companies Act,2013 read with Rule 15 (3) of the Companies (Management and Administration) Rules, 2014	Annual return and copies of all certificates and documents required to be annexed thereto	Form no. MGT-7	Period of 8years from the date of filing with the Registrar	Registered Office
6.	Rule 9 (3) of the Companies (Meetings of Board and its Powers) Rules, 2014.	Disclosures/ Notices by a director of his interest	Form no. MBP- 1.	Period of 8 years from the end of the financial year to which it relates	Registered office
7.	Section 128(5) of the Companies Act,2013	Books of Accounts including vouchers relevant to any entry in such books of account	-	8 financial years preceding current financial year	Registered office of the company or at such other place in India

3.3 Other Documents

Sl. no.	Section/ Rules	Description of document	Time Limit for preservation	Place of maintaining document
1.	Rule 7 (3) of the Companies (Share Capital and Debentures) Rules, 2014.	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	Registrars & Transfer Agent of the company
2.	Rule 7 (3) of the Companies (Share Capital and Debentures) Rules, 2014.	All certificates surrendered to a company shall immediately be defaced by stamping or printing the word “cancelled” in bold letters	may be destroyed after the expiry of 3 years from the date on which they are surrendered, under the authority of a resolution of the Board and in the presence of a person duly appointed by the Board in this behalf:	Registrars & Transfer Agent of the company

4.0 Maintenance of records in electronic form:

Pursuant to Section 120 of the Companies Act, 2013 read with rule 27 of the Companies (Management and Administration) Rules, 2014 The documents in electronic form shall be maintained in following manner:

- a) the records are maintained in the *same formats and in accordance with all other requirements* as provided in the Act or the rules made there under;
- b) the information as required under the provisions of the Act or the rules made there under should be *adequately recorded for future reference*;
- c) the records must be capable of being *readable, retrievable and reproducible in printed form*;

- d) the records are capable of being *dated and signed digitally* wherever it is required under the provisions of the Act or the rules made there under;
- e) the records, once dated and signed digitally, *shall not be capable of being edited or altered*;
- f) the records shall be *capable of being updated*, according to the provisions of the Act or the rules made there under, and *the date of updating shall be capable of being recorded on every updating*.

“records” means any register, index, agreement, mem orandum, minutes or any other document required by the Act or the rules made there under to be kept by a company.

5.0 Maintenance and Security of electronic records:

Pursuant to Rule 28 of the Companies (Management and Administration) Rules, 2014 Company Secretary shall be responsible for the maintenance and security of electronic records and shall-

- a) provide adequate *protection against unauthorized access, alteration or tampering of records*;
- b) ensure *against loss of the records as a result of damage to, or failure of the media* on which the records are maintained;
- c) ensure that the *signatory of electronic records does not repudiate the signed record as not genuine*;
- d) ensure that *computer systems, software and hardware are adequately secured and validated to ensure their accuracy, reliability and consistent intended performance*;
- e) ensure that the *computer systems can discern invalid and altered records*;
- f) ensure that *records are accurate, accessible, and capable of being reproduced for reference later*;
- g) ensure that the *records are at all times capable of being retrieved to a readable and printable form*;
- h) ensure that *records are kept in a non-rewriteable and non-erasable format like pdf. version* or some other version which cannot be altered or tampered;
- i) ensure that *at least one backup, taken at a periodicity of not exceeding one day*, are kept of the updated records kept in electronic form, every backup is

authenticated and dated and such backups shall be securely kept at such places as may be decided by the Board;

- j) *limit the access to the records to the managing director, company secretary or any other director or officer or persons performing work of the company as may be authorized by the Board in this behalf;*
- k) *ensure that any reproduction of non-electronic original records in electronic form is complete, authentic, true and legible when retrieved;*
- l) *arrange and index the records in a way that permits easy location, access and retrieval of any particular record; and*
- m) *take necessary steps to ensure security, integrity and confidentiality of records.*

6.0 Destruction of documents.

Subject to the provisions of the Companies Act 2013 read with rules made thereunder, the documents may be destroyed after the expiration of the period of their preservation as specified in clause.3.0. of the policy for preservation of documents.

7.0 Record of document destroyed to be maintained.

The Company Secretary shall maintain a Register wherein he shall enter brief particulars of the records destroyed and shall certify by his own hand writing therein the date and mode of destruction.
