



ROTO PUMPS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. PREFACE

Roto Pumps Limited has always endeavored to be a good corporate citizen. It aims to be compliant with every requirement applicable to it and maintain utmost transparency in conducting its business to ensure fairness in working of the Company and maximization of stakeholder's value.

It is in this regard that the Board of Directors (the "Board") of Roto Pumps Limited (RPL or the "Company") has adopted the following policy with regard to preservation of Documents. This Policy has been formulated in accordance with the requirements of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. This Policy shall be known as "Policy for Preservation of Documents".

2. PURPOSE OF THE POLICY

This policy has been framed and implemented with the purpose of specifying the type(s) of document(s) and the time period for preservation thereof based on the classification as prescribed under Regulation 9 of Listing Regulations, 2015.

3. DEFINITIONS

- a. "**Act**" means the Companies Act, 2013 and rules made there under, as amended from time to time.
- b. "**Regulations**" shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- c. "**Company**" means Roto Pumps Limited.
- d. "**Board**" or "**Board of Directors**" shall mean the Board of Directors of Roto Pumps Limited, as may be reconstituted from time to time.
- e. "**Document**" includes the following:
 - i. 'books and papers' as defined in clause 12 of section 2 of the Companies Act, 2013;



- ii. 'books of accounts' as defined in clause 13 of section 2 of the Companies Act,2013;
- iii. 'documents' as defined in clause 36 of section 2 of the Companies Act,2013;
- iv. 'registers' as defined in clause 74 of section 2 of the Companies Act,2013

4. TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The Company shall maintain and preserve documents as specified hereunder:

- A)** The documents whose preservation is permanent nature (as mentioned in **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

- B)** The documents with preservation period of not less than eight years after completion of the relevant transactions(as mentioned in**Annexure-2**) shall be maintained and preserved by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

Further, the company may, as it deems fit and possible from time to time; maintain above mentioned documents in electronic form to the extent possible.

5. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy. They shall ensure that the documents are preserved in the manner as anticipated by the directors in framing this policy.

6. AMENDMENT

Any change in the Policy can be made by the Board of Directors of the Company in case of the policy becoming inconsistent with the provisions of the applicable laws due to any amendment therein or re-enactment thereof. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as they deem fit and proper.



7. DISSEMINATION

A copy of this policy duly approved shall be placed before the Board and circulated among all the Directors of the Company for their necessary action. The concerned departments like Human Resource and Administration Department are required to notify & communicate the existence, scope and contents of this policy to the employees/ functional heads on whom the implementation of this policy has been entrusted by the Board of Directors.

The new employees shall be informed about the policy by the Human Resource and Administration department at the time of their joining the organisation. This policy as amended from time to time shall be made available at the website of the Company.

Annexure 1:

Documents whose preservation shall be permanent in nature:

S.No	Nature of Document(s)
01	All documents and Information originally filed with ROC for Incorporation of Company
02	Memorandum of Association and Articles of Association as originally filed and updated from time to time
03	Statutory Registers under Companies Act, 2013 and other applicable laws.
04	Minutes of General Meeting
05	Minutes of Board Meeting
06	Minutes of various Committee Meetings
07	Registration Certificates
08	Licenses and Statutory Approvals
09	Copy of material agreements and contracts
10	Orders from any statutory authority
11	Any other document required to maintain in terms of any applicable law(s), maintained and preserved from time to time.



Annexure 2:

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

S.No	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s)
03	Non-statutory registers and documents
04	Communications with shareholders/other departments
05	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.