

Approved by Board in their 287th Meeting held on 28.12.2015.

Policy for Preservation of Statutory Documents

नालको  NALCO

NATIONAL ALUMINIUM COMPANY LIMITED

NALCO BHAWAN, P/1, NAYAPALLY,

BHUBANESWAR – 751013, ODISHA

Policy for Preservation of Statutory Documents

1.0 The Policy on preservation of statutory documents and their custodians is as follows:

A. Documents to be preserved permanently

| Sl. No. | Description |
|---------|--|
| 01 | Minutes books of General Meeting, Board Meeting, Committee meetings, Resolution by Postal Ballot |
| 02 | Register of Investments in securities not held in the name of the company |
| 03 | Register of Charges |
| 04 | Register and Index of Members |
| 05 | Foreign Register of Members |
| 06 | Register of renewed and duplicate certificates |
| 07 | Register of contracts in which directors are interested |
| 08 | Register of Directors, Managing Director, Manager, Secretary & Key Managerial Personnel |
| 09 | Register of Directors' shareholdings |
| 10 | Register of loans/guarantee/security and investments |
| 11 | Register of investments (other than securities not held in the name of the company) |
| 12 | Register of documents executed under common seal |
| 13 | Register of records and documents destroyed |
| 14 | Register of transfer of shares |
| 15 | Register of transmission of shares |
| 16 | Register of transfer of debentures |
| 17 | Register of transmission of debentures |
| 18 | Register in respect of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 |

B. Documents to be preserved for not less than eight (8) years.

| Sl. No. | Description |
|---------|--|
| 01 | Register of Buy-back of securities |
| 02 | Instruments creating Charges |
| 03 | Register and Index of Debenture holders |
| 04 | Foreign Register of debenture holders |
| 05 | Register of Deposits |
| 06 | Register of Allotment |
| 07 | Register of payment of dividend |
| 08 | Register of Directors' attendance |
| 09 | Register of Postal ballot |
| 10 | Register of Proxies |
| 11 | Register of Inspection |
| 12 | Register of Investors' complaints |
| 13 | Register of Employee stock options |
| 14 | Register of Sweat equity shares |
| 15 | Register in respect of SEBI (Prohibition of Insider Trading) Regulations, 2015 |
| 16 | Books of Accounts |
| 17 | Annual Return |
| 18 | A. Disclosures received by the company under the SEBI (Substantial Acquisition of Shares and Takeovers Regulations), 2011 [SAST Regulations] B. General Meeting Records C. Record of Directors particulars D. Notice of disclosure of interest by the Directors, officers and substantial shareholders under Model Code of Conduct E. Certificate received from Secretarial Auditors F. Documents to be filed with Registrar of Companies. G. Any court order / CLB order H. Annual Reports I. Replies to show cause notices, if any etc. J. Record of Employee Stock Purchase Scheme (ESPS) K. Record of issued and cancelled Share / Debenture certificates. |

- C. All the above registers and documents shall be in the custody of Company Secretary of the Company, except those mentioned at sl. nos. A-10, 11 & B-16, which shall be in the custody of Head of Corporate Finance Dept. or any other person authorized by CMD for the purpose. Foreign register of members or debenture holders will be in the custody of the person in-charge of the office in the foreign country.

- D. (i) Wherever the specific period of preservation is mentioned in the Act/Rules/Secretarial Standards, the same be adopted from time to time.
- (ii) Wherever the specific period of preservation is not mentioned in this policy or in the Act/Rules/Secretarial Standards, CMD is authorized to decide from time to time the preservation period and the person under whose custody the documents should be kept.
- E. Destruction of all the above registers and documents shall be done after the preservation period and with the approval of ED-Company Secretary.