

## **POLICY FOR PRESERVATION OF DOCUMENTS**

- **PREFACE**

The Board of Directors (the “Board”) of Hindustan Zinc Ltd. (the “Company”) has approved the following Policy (“The Policy”) of the Company for preservation of Documents/Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

- **PURPOSE**

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

- **ADMINISTRATION**

Attached as **Appendix A** is a Documents Preservation Schedule of HZL., that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company preserves the Documents in electronic mode. The Compliance Officer of the Company, is in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The CEO and CFO are Jointly authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

- **PROCEDURE FOR DISPOSAL OF DOCUMENTS**

The Documents of the Company which are no longer required as per the time schedule prescribed in the **Appendix A** may be destroyed. The Head of the Department may direct Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix A. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at **Appendix B**.

- **SUSPENSION OF DOCUMENTS DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS**

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed off in totality. The Head of the Department shall immediately inform all employees under him for suspension of further disposal of Documents related to those litigations.

- **COMMUNICATION OF THIS POLICY**

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company.

- **AMENDMENT**

CEO and CFO of the Company are jointly authorized to carry out the amendment / changes in the policy keeping in the view the business needs and the Changes in the statutory regulations.

**APPENDIX A - DOCUMENTS PRESERVATION SCHEDULE**

The Documents Preservation Schedule is organized as follows:

**SECTION TOPICS**

- A. CORPORATE RECORDS
- B. ACCOUNTS AND FINANCE
- C. TAX RECORDS
- D. LEGAL FILES AND PAPERS
- E. PROPERTY RECORDS
- F. CORRESPONDENCE AND INTERNAL MEMO
- G. INSURANCE RECORDS
- H. MINING & EXPLORATION RECORD
- I. STATUTORY RETURNS UNDER VARIOUS ACTS
- J. PERSONNEL RECORDS
- K. OTHER RECORDS
- L. ELECTRONIC RECORDS

<b>A. CORPORATE RECORDS</b>		
<b>Sr. No.</b>	<b>Record Type</b>	<b>Preservation period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	Memorandum And Articles Of Association	Permanent
2.	Common Seal	Permanent
3.	Affidavit/Consent from the Subscribers to the Memorandum and from persons named as the First Directors	Permanent
4.	Books and Documents relating to the issue of share certificates, including the blank forms of share certificates	All books shall be preserved for not less than 30 years, and in case of disputed cases, permanently. All certificates surrendered to a Company shall immediately be defaced by stamping or printing the word cancel in bold letters and may be destroyed after the

		expiry of three years from the date on which they are surrendered.
5.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
6.	Statutory Registers	Permanent
7.	License and Permissions	Permanent
8.	Statutory Forms except for routine compliance	Permanent
9.	Register of Members	Permanent
10.	Index of Members	Permanent
11.	Loans Investments Guarantee by Company	Permanent
<b>DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS</b>		
12.	Annual Returns	8 years from the filling with MCA
13.	Register of Director's and member's Attendance	8 years
14.	Register of Inspection	8 years
15.	Register of transfer and transmission	8 years
16.	Disclosure of interest by Board of Directors	8 years
17.	Ballot Papers and Scrutinizers Reports	8 years
18.	Board Agenda and supporting documents	8 years
19.	Office copies of Notice of General Meeting and related papers	8 years or as long as they remain current
20.	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers.	8 years or as long as they remain current
21.	All notices pertaining to disclosure of interest of directors	8 years
22.	Documents/Forms filed with Registrar of Companies	8 years

<b>B. ACCOUNTS AND FINANCE</b>		
Sr.No.	Record Type	Preservation Period
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	Annual Audit Reports and Financial Statements	Permanent
<b>DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS</b>		
2.	Business Plans and Budgets	8 years after completion of Audit
3.	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
4.	Bank Statements	8 years
5.	Investment Records	8 years
<b>MISCELLANEOUS</b>		
6.	General Correspondence	2 years

<b>C. DIRECT/ INDIRECT TAX RECORDS</b>		
<b>Sr.No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	Tax Exemption and Related documents	Permanent
2.	Assessment/ appeal orders	Permanent
<b>DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS</b>		
1.	Tax Deducted at Source Records	8 years from the end of Financial Year or completion of assessment under the applicable law is over whichever is later.
2.	Tax Bills, receipts and payments	8 years or till completion of assessment.
3.	Income Tax papers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
4.	Service Tax papers	8 years from the end of Financial Year or completion of assessment under Service Tax whichever is later
5.	Other Tax papers	3 years from the end of Financial Year.

<b>D. LEGAL FILES AND RECORDS</b>		
<b>Sr.No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	Court Orders	Permanent
<b>DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS</b>		
2.	Contracts, Agreements and Related correspondence	8 years
<b>MISCELLANEOUS</b>		
3.	Legal Memoranda and Opinions including subject matter files	3 years after closure of the matter
4.	Litigation files	3 years after closure of the Litigations

<b>E. PROPERTY RECORDS</b>		
<b>Sr.No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	Original Purchase, Sale Agreement. Executed property transfer documents	Permanent
2.	Property Card, Index II, Ownership records issued by Government Authority	Permanent
3.	Govt. Land acquisition orders	Permanent

<b>F. CORRESPONDENCE AND INTERNAL MEMO</b>		
<b>Sr.No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	Those pertaining to non-routine matters or having significant lasting consequences.	Permanent
<b>MISCELLANEOUS</b>		
2.	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. <ul style="list-style-type: none"> <li>• Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings;</li> <li>• Letters of general enquiry and replies that complete cycle of correspondence;</li> <li>• Letter of complaint requesting specific actions that have no further value after change of name or address;</li> <li>• Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.</li> </ul>	2 years

<b>G. INSURANCE RECORDS</b>		
<b>Sr.No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	Insurance Policies	2 years or till settlement of the claims whichever is later
<b>DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS</b>		
2.	Property Valuation reports	8 years
3.	Inspections Reports	8 years
<b>MISCELLANEOUS</b>		
4.	Claims records	Till settlement is over and claim money is received
5.	Group Insurance Plans	Until plan is amended or terminated

<b>H. MINING &amp; EXPLORATION RECORDS</b>		
<b>Sr.No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	Mining leases including PL/ML application	Permanent
2.	IBM plans and statutory documents under Mines Act.	Permanent
<b>DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS</b>		
1.	Returns filed under Mines Act/ Factories Act	8 years
<b>MISCELLANEOUS</b>		

<b>I. STATUTORY RETURNS UNDER VARIOUS ACT</b>		
<b>Sr.No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	All types of Licenses & Statutory approvals, Environment Clearances etc.	Permanent
<b>DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS</b>		
<b>MISCELLANEOUS</b>		

<b>J. PERSONNEL RECORDS</b>		
<b>Sr.No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
1.	Payroll Registers	3 years
2.	Bonus, incentives, awards and other Statutory Records.	3 years
3.	Personnel files	Till 3 years from the date of VRS/ superannuation/ resignation from the Company.
<b>DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS</b>		
4.	Time office Records and Leave records	3 years
5.	Unclaimed Wages Records	3 years
6.	Employees Information Records	3 years
<b>MISCELLANEOUS</b>		

<b>K. OTHER RECORDS</b>		
<b>Sr.No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>DOCUMENTS TO BE RETAINED PERMANENTLY</b>		
<b>DOCUMENTS TO BE RETAINED FOR A MINIMUM PERIOD OF 8 YEARS</b>		
<b>MISCELLANEOUS</b>		
1.	Other Documents	All other documents not specified alone shall be retained for a minimum period of 2 years or till the transaction completes. (whichever is later)

<b>L. ELECTRONIC RECORDS</b>		
<p><b>1. Electronic Mail</b> All electronic communication systems as well as all communications and stored information transmitted, received, or contained on the Company's information systems are the property of the Company.</p> <ul style="list-style-type: none"> <li>• All e-mails received from Internal and External Sources may be deleted after 2 years.</li> <li>• Employees will strive to keep their e-mails related to business issues.</li> <li>• Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.</li> </ul>		
<p><b>2. Web Page Files : Internet cookies</b></p> <p>The Company does not automatically delete electronic files beyond the date</p>		

specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy. Each month the Company will run backup copy of all Electronic files including email on servers. The backup copy is considered a safeguard for the record retention system of the Company.

In certain cases document will be maintained both paper and electronic form.

#### **APPENDIX-B**

<b>S. No.</b>	<b>Particulars of documents destroyed</b>	<b>Date and mode of destruction with the initials of Secretary or UFH/UH/other authorised person(s)</b>