

MIDWEST GOLD LIMITED

(FORMERLY NOVA GRANITES (INDIA) LIMITED)

POLICY ON PRESERVATION OF DOCUMENTS

1. LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) 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 Midwest Gold Limited (“the Company”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

EFFECTIVE DATE

This Policy is effective December 1, 2015.

2. DEFINITIONS

A. “Board of Directors” or “Board”

Board of Directors or Board shall mean the Board of Directors of Midwest Gold Limited, as constituted from time to time.

B. “Company”

Company shall mean **“Midwest Gold Limited”**.

C. “Documents”

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.

D. “Listing Regulations”

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

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

A. The documents of a permanent nature (listed in **Annexure 1**) 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.

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

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure-2**) 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 eight years.

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

4. 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.

5. GENERAL

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

6. 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.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

8. 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 1

S.No	Documents whose preservation shall be permanent in nature	Nature of Document(s)
01	Registration Certificates	Permanent
02	Licenses & Statutory Approvals	Permanent
03	Statutory Registers required under applicable laws	Permanent
04	Audited financial statements	Permanent
05	Minutes of General Meeting	Permanent
06	Minutes of Board Meeting	Permanent
07	Minutes of various Committee Meetings	Permanent
08	Material Agreements/Contracts	Permanent
09	Orders issued by Courts/Statutory bodies	Permanent
10	Investment Documents/proofs including certificates etc.	Permanent
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.	Permanent

Annexure 2

S.No	Documents with preservation period of not less than eight years after completion of the relevant transactions	Nature of Document(s)
01	Books of Accounts	8 years
02	Annual Return(s)	8 years
03	Personnel Documents	8 years
04	Insurance Policies/ Claims under various policies	8 years
05	Correspondences with Departments/shareholders	8 years
06	Non-Statutory Registers/Documents	8 years
07	Films, Videos, CDs, DVDs, tapes etc.	8 years
08	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.	8 years