



## **POLICY ON PRESERVATION OF DOCUMENTS/ ARCHIVAL POLICY ON WEBSITE DISCLOSURE**

### **1. Preface**

This Policy has been formulated in accordance with the Regulation 9 and Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), with regard to the preservation of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode including those which are disclosed on the website of the Company (hereinafter referred to as “the Documents”).

### **2. Purpose of the Policy**

The purpose of this Policy is to ensure that 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.

### **3. Effective Date**

The policy will be applicable to the Company w.e.f December 1, 2015.

### **4. Administration**

Attached as **Appendix A** is a “Documents Preservation Schedule” that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Compliance Officer of the Company (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also 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.

### **5. Manner of Public Disclosure of records published on the Website of the Company**

The documents required to be published on the website of the Company shall be hosted under the “Investor Relations” section of the website for a period of 5 (Five) years from date of disclosure on the website of the Company i.e. [www.indiaglycols.com](http://www.indiaglycols.com).



Thereafter, the same shall be transferred to the “Archives” section till such time as may be instructed by the Chairman & Managing Director of the Company. However, in case of any updation in disclosure of such published record, the older record can be removed from the website of the Company as per the will of the Directors of the Company or the Company Secretary, provided it does not lead to contravention of any law(s) or regulation(s) in force.

## 6. Communication of this Policy

This Policy shall be posted on the website of the Company i.e. [www.indiaglycols.com](http://www.indiaglycols.com) and also on the intranet website of the Company.

## 7. Role and Responsibility of various Departmental heads

- a. The Departmental heads must be familiar with this policy and educate their Department in this regard.
- b. They must restrict access to confidential records and information.
- c. They must coordinate in the destruction of the records when required.

## 8. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. 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 it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

## 9. Destruction of Records

Records which have aged as per the details in Appendix “A” and are no longer required, would be destroyed in order to free filing equipment for storage of records currently needed in the conduct of business. Records destruction would also improve operational efficiency by reducing the quantity of records to be searched in order to locate the needed information.

However, all confidential records shall be destroyed **ONLY AFTER** the approval of the Chief Executive Officer (CEO) and the Chairman & Managing Director (CMD).

The modes of destruction of records shall include (but not limited to) the following:

- a. Confidential paper records- shall be destroyed by making them unreadable.
- b. Non-confidential paper records- shall be sold to waste-paper dealers by making them unreadable or recycle the same.
- c. Electronically stored records- shall be erased or destroyed with the help of the IT Department.
- d. Destruction of magnetic media records such as floppy disks- shall be destroyed by reformatting the same at least once.
- e. Destruction of optical media records such as rewritable disks- shall be destroyed by cutting, crushing or other physical means.



**Note:**

***No records whatsoever shall be destroyed without the PRIOR WRITTEN APPROVAL obtained by the Departmental Head from the Chief Executive Officer (CEO) and the Chairman & Managing Director (CMD) of the Company.***

***Further, copy of the original approval obtained for the 'Destruction of any records' shall be forwarded to Head of the Human Resource & Administration Department for permanent record with a copy of the same marked to :***

- Chief Financial Officer (CFO) and***
- Company Secretary (CS) of the Company.***

***Physical Destruction of the records shall be undertaken ONLY AFTER 14 WORKING DAYS from the date of obtaining the approval from CEO and CMD, and copies of the approval have been duly served on the CFO & CS.***

***Scanned copies of the Documents to be destroyed, if deemed necessary by the respective Head of Department or CEO or CMD, shall be arranged and stored by the IT Department on the IT server and the same shall be available for retrieval, whenever required for future reference.***

**APPENDIX “A” – DOCUMENTS PRESERVATION SCHEDULE**

The “Documents Preservation Schedule” shall be as categorized as under:

**Section Topic**

- A. Statutory Corporate Records
- B. Finance and Accounts
- C. Tax Records
- D. Legal Files and Documents
- E. Property Records
- F. Project Records
- G. Correspondence and Internal Memos
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records

<b>A: Statutory Corporate Records</b>		
<b>Sr. No.</b>	<b>Record Type</b>	<b>Preservation Period</b>
<b>Documents to be retained permanently</b>		
1.	Common Seal	Permanent
2.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3.	Statutory Registers	Permanent
4.	License and Permissions	Permanent
5.	Statutory Forms except for routine Compliance	Permanent
6.	Scrutinizers Reports	Permanent
7.	Register of Members	Permanent
8.	Index of Members	Permanent
9.	Loan Agreements, Sanction Letters of Banks & Financial Institutions	Permanent
10.	Annual Returns	Permanent
11.	Board Agenda and supporting documents	Permanent
12.	Attendance Registers of Board, Committee and General Meeting	Permanent
13.	Office copies of Notice of General Meeting and related papers	Permanent
14.	Office copies of Notice of Board Meeting/ Committee Meeting, Agenda, Notes on Agenda and other related Papers	Permanent
<sup>1</sup> 14A.	#Proof for sending and delivery of Notice of Board and Committees Meetings, Agenda alongwith its Notes on Agenda, Circular Resolution(s) and Minutes[‘the Documents’]	3 Years from the date of respective Meeting(s)

*# for the cases where any legal proceedings in connection with the Documents or proceedings/ subject-matter covered directly by such Documents are pending, the same shall be maintained till complete disposal of the proceedings, including limitation period for any appeals.*

<sup>1</sup> Inserted vide Board Resolution dated 9<sup>th</sup> November, 2017.



Other Documents		
15.	Register of Debenture-holders, if any	8 years after the redemption of Debentures
16.	Index of debenture-holders, if any	8 years after the redemption of Debentures
<sup>2</sup> 17.	Structured Digital Database under SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2020	8 years after completion of the relevant transactions and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the same be preserved till the completion of such proceedings, or as may be directed by SEBI, from time

B: Accounts and Finance		
Sr. No.	Record Type	Preservation period
<b>Documents to be retained permanently</b>		
1.	Annual Audit Reports and Financial Statements	Permanent
<b>Other Documents</b>		
2.	Annual Plans and Budgets	3 years after completion of Audit
3.	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or after completion of assessment under Income Tax, whichever is later
4.	Investment Records	8 Years
5.	General Correspondence	2 years

C: Tax Records		
Sr. No.	Record Type	Preservation period
<b>Documents to be retained permanently</b>		
1.	Tax Exemption and Related documents	8 Years

<sup>2</sup> Inserted vide Board Resolution dated 6<sup>th</sup> November, 2020.



2.	Income Tax papers	Permanent
<b>Other Documents</b>		
3.	Income Tax papers related to Foreign Assets	8 years from the end of Financial Year or after completion of assessment under Income Tax, whichever is later
4.	Excise Records	8 years from the end of the Financial Year or after completion of assessment under the applicable law, whichever is later
5.	Service Tax papers	12 years from the end of Financial Year or after completion of assessment under Service Tax, whichever is later

<b>D: Legal Files and Records</b>		
Sr. No.	Record Type	Preservation period
<b>Documents to be retained permanently</b>		
1.	Court Orders	Permanent
<b>Other Documents</b>		
2.	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts
3.	Legal Memoranda and Opinions including subject matter files	3 years after the closure of matter/case
4.	Litigation files	3 years after closure of the matter

<b>E: Property Records</b>		
Sr. No.	Record Type	Preservation period
<b>Documents to be retained permanently</b>		
1.	Original Purchase and Sale Agreement	Permanent
2.	Property Card, Index II, Ownership records issued by Government Authority	Permanent



Other Documents		
3.	Property Insurance	8 years

F: Project		
Sr. No.	Record Type	Preservation period
<b>Documents to be retained permanently</b>		
1.	Project Documents and Related correspondence (including any proposal of the Project and its approval)	Permanent or alternatively latest 5 years in hard copy and old records in soft copy

G: Correspondence and Internal Memo		
Sr. No.	Record Type	Preservation period
<b>Documents to be retained permanently</b>		
1.	Those pertaining to non-routine matters or having significant lasting consequences	Permanent
<b>Other Documents</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 compliant requesting specific actions that have no further value after change of name or address;</li></ul> Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.	2 years

H: Insurance Records		
Sr. No.	Record Type	Preservation period
1.	Insurance Policies	3 years



2.	Claims records	3 years after settlement is over and claim money is received
3.	Group Insurance Plans	3 years

<b>I: Personnel Records</b>		
<b>Sr. No.</b>	<b>Record Type</b>	<b>Preservation period</b>
1.	Payroll Registers	8 years
2.	Bonus, Gratuity and other Statutory Records	8 years
3.	Time office Records and Leave Cards	8 years
4.	Unclaimed Wages Records	8 years
5.	Employees Information Records	3 years after separation
6.	Employees Medical Record	3 years after separation

<b>J: Electronic Records</b>
<p><b>1. <u>Electronic Mail</u></b></p> <ul style="list-style-type: none"><li>• All e-mails received from Internal and External Sources may be deleted after 8 years.</li><li>• Employees will strive to keep their e-mails related to business issues.</li><li>• All Emails related to business issues should be downloaded to a server or user directory on server.</li><li>• Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.</li><li>• All e-mails of Employees which are important should be copied to the employees' folder.</li></ul>
<p><b>2. <u>Web Page Files : Internet cookies</u></b></p> <p>All workstations Internet Explorer should be scheduled to delete Internet cookies once per month. The Company does not automatically delete electronic files beyond the date 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. This backup is safeguard to retrieve lost information within 1 year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.</p> <p>In certain cases document will be maintained in both paper and electronic form.</p>