



CHEMCRUX ENTERPRISES LIMITED
DOCUMENT RETENTION AND ARCHIVAL POLICY

**Pursuant to Regulation 9 and 30(8) of
SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015**

DOCUMENT RETENTION AND ARCHIVAL POLICY - CEL

Background :

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations") and Companies Act, 2013. Archival Policy as referred to in Regulation 30 (8) of the Listing Regulations forms part of this Policy.

Purpose of the Policy :

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

- a. Documents whose preservation shall be permanent in nature;
- b. Documents with a preservation period of not less than eight years after completion of the relevant transactions.

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode. Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time. Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013. This policy was adopted by the Board of Directors at their meeting held on 20th December, 2016.

1. DEFINITIONS :

"Board of Directors" or **"Board"** shall mean the Board of Directors of Chemcrux Enterprises Limited, as constituted from time to time.

"Company" shall mean Chemcrux Enterprises Limited.

"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.

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

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2. PRESERVATION OF DOCUMENTS :

Records / documents may be preserved either physically or in electronic form.

2.1 Documents of permanent nature.

The documents of permanent nature shall be maintained and preserved permanently by the Company in accordance with the provisions of Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable to the Company from time-to-time, subject to the modifications, amendments, additions, or deletions 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.

2.2 Documents whose preservation shall be permanent in nature :

- Registration Certificates required under applicable laws.
- Authorisation / Licenses obtained from any Statutory Authority.
- Memorandum and Articles of the Company.
- Statutory Registers required to be kept permanently under Companies Act, 2013.
- Minutes - Board Meeting, General meetings and Committee Meetings including resolutions passed through postal ballots and circular resolution.
- Agreements made and approvals received by the Company from Stock Exchanges & Depositories.
- Any Orders issued by Courts /Statutory Bodies / any other Regulatory Authority.
- Policies of the Company framed under various regulations from time to time.
- Register of Disposal of records.
- Any other documents as may be required to maintain permanently in terms of applicable law(s) from time to time.

2.3 Documents with preservation period of not less than eight years after completion of relevant transaction.

- Annual Returns and Annual Reports.
- Documents / Instruments relating to creation, modification or satisfaction of charges from

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the date of complete satisfaction of any Charge.

- Books of accounts including Vouchers / Voucher register,
- Annual Financial Statements including Auditors Report.
- Income Tax Returns filed under Income Tax Act, 1961.
- All notices pertaining to disclosure of interest of Directors and KMPs.
- Postal ballots and all other papers or registers relating to postal ballot including voting by electronics means.
- Disclosures / Returns filed under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 and other SEBI Rules and Regulations..
- Notices, Intimations, Agenda, Agenda notes, draft minutes and other relevant papers circulated to members of Board of Directors relating to Board Meetings, Committee Meetings, Independent Directors Meetings.
- Forms and returns filed with RBI / MCA or with any other Statutory Authority.
- Any other documents /registers as may be required in terms of applicable law(s) , which are required to be preserved for a period of not less than eight years, shall be maintained and preserved accordingly from time to time.

3. DOCUMENTS WITH PRESERVATION PERIOD OTHER THAN THOSE MENTIONED IN (2) ABOVE :

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in 1 & 2 above shall be preserved accordingly.

4. DESTRUCTION OF RECORDS :

The Company shall maintain a register of disposal of records in the custody of the Compliance Officer of the Company, wherein the brief particulars of the records disposed of shall be entered. The register of disposal of records shall contain the following columns: a) Item Number; b) Brief Particulars of the records disposed of; c) Date of approval for disposal of records; d) Date of disposal; and e) Mode of destruction. This register of disposal of records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or electronic form.

5. SUSPENSION OF RECORDS DISPOSAL IN THE EVENT OF LITIGATION / 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, then the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time

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the matter is settled or resolved or disposed off. The company secretary shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

6. AMENDMENTS AND UPDATES

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

7. DISCLOSURE OF THE POLICY

The Company shall disclose this Policy on its website i.e. (www.chemcrux.com).

ARCHIVAL POLICY

1. INTRODUCTION

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires listed companies to disclose on its website all such events or information which has been disclosed to stock exchange(s) under Regulation 30 of the new Regulations, and such disclosures shall be hosted on the website of the company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website. This Policy is framed in accordance with the new Regulations notified on 2nd September 2015 and other SEBI Circulars as specified in this regard. This policy shall be effective from 20th December 2016 being the date when the Board approved the Policy.

2. SCOPE

This policy covers all events or information which has been disclosed to Stock Exchange(s) under Regulation 30 of the new Regulations.

3. POLICY

The events or information which has been disclosed by the Company to the Stock Exchange(s) under Regulation 30 of the new Regulations will be hosted on the website of the Company for a period of five years from date of its initial posting/ hosting. These disclosures may be removed / deleted from the website after expiry of five years from the aforementioned date.

4. DISSEMINATION OF POLICY

This Policy shall be hosted on the website of the Company at www.chemcrux.com.
