

CHEMCRUX ENTERPRISES LIMITED
DOCUMENT PRESERVATION AND ARCHIVAL POLICY



Registered Office: 330, TRIVIA Complex, Natubhai Circle, Racecourse

Vadodara- 390 007

Website: www.chemcrux.com

Approved by	Board of directors
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Version	2

CHEMCRUX ENTERPRISES LIMITED - DOCUMENT PRESERVATION AND ARCHIVAL POLICY

PART: I DOCUMENT PRESERVATION POLICY

1. LEGAL FRAMEWORK:

Regulation 9 of the Securities and Exchange Board of India (SEBI), (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) mandates listed entities to formulate a policy for preservation of documents, to be approved by its Board of Directors (termed as Board in this document) and to be published on their website. Accordingly, Policy for Preservation of Documents (Policy) is framed and implemented.

2. DEFINITIONS:

- (i) **“Board of Directors” or “Board”** shall mean the Board of Directors of the Company, as constituted from time to time.
- (ii) **“Company”** shall mean Chemcruz Enterprises Limited.
- (iii) **“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.
- (iv) **“SEBI Listing Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

3. DOCUMENT PRESERVATION SCHEDULE PROCESS:

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

A. Documents of permanent nature:

The documents of a permanent nature 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. Documents whose preservation shall be permanent in nature are:

- i. Registration Certificates required under applicable laws.
- ii. Authorisation / Licenses obtained from any Statutory Authority.
- iii. Memorandum and Articles of Association of the Company as amended from time to time.
- iv. Statutory Registers required to be kept permanently under applicable laws.
- v. Minutes of Board Meeting, General meetings and Committee Meetings including resolutions passed through postal ballots, resolutions passed by circulation and the meetings of creditors.
- vi. Agreements made and approvals received by the Company from Stock Exchanges & Depositories.
- vii. Audited Financial Statements and Auditors Report.
- viii. Any Orders issued by Courts /Statutory Bodies / any other Regulatory Authority.
- ix. Policies of the Company framed under various regulations from time to time.

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- x. Register of Disposal of records.
- xi. Any other documents as may be required to maintain permanently in terms of applicable law(s) from time to time.

B. Documents with preservation period of minimum period of eight years after completion of relevant transaction

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions 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. Documents with preservation period of not less than eight years after completion of relevant transaction are:

- i. Annual Returns and Annual Reports.
- ii. Documents / Instruments relating to creation, modification or satisfaction of charges from the date of complete satisfaction of any Charge.
- iii. Books of accounts including Vouchers / Voucher register,
- iv. Income Tax Returns filed under Income Tax Act, 1961.
- v. All notices pertaining to disclosure of interest of Directors and KMPs.
- vi. Postal ballots and all other papers or registers relating to postal ballot including voting by electronics means.
- vii. Disclosures / Returns filed under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 and other SEBI Rules and Regulations.
- viii. 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.
- ix. Attendance Register of Board & Committee Meetings and General Meetings.
- x. Forms and returns filed with RBI / MCA or with any other Statutory Authority.
- xi. 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.

Notwithstanding anything contained in this Policy, if a higher period of retention of document is required in any Act / Statute, then the documents will have to be retained for such higher period.

4. DOCUMENTS WITH PRESERVATION PERIOD OTHER THAN THOSE MENTIONED IN LIST A & B 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 Point 3 (A & B) shall be preserved accordingly.

5. DESTRUCTION OF RECORDS:

The records/ documents preserved shall be reviewed every year or according to the need of the respective departments and actions taken to destroy those records which are due for disposal. The Company shall maintain a register of disposal of records in the custody of the Compliance Officer of

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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.

6. SUSPENSION OF RECORDS DISPOSAL IN THE EVENT OF LITIGATION/CLAIMS:

In the event the Company is served with any notice for documents from any statutory authority 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 until such time the matter is settled or resolved or disposed of. The Company Secretary shall immediately inform all employees of the Company for suspension of further disposal of Documents.

7. MODE OF PRESERVATION:

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

8. POLICY REVIEW:

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.

9. DISCLOSURE OF THE POLICY:

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



PART: II ARCHIVAL POLICY

1. INTRODUCTION:

Regulation 30(8) of the SEBI Listing Regulations requires every listed entity to make available an archival policy on its website. In this context, the following policy has been framed by the Board of Directors of the Company.

2. SCOPE:

In line with the Company's Policy on Determination of Materiality of Events and as per the SEBI Listing Regulations, the Company shall disclose all Material events to the Stock Exchanges and such disclosures shall be hosted on the website of the Company for a period of 5 years and thereafter the same shall be archived so as to be available for retrieval for a further period of three years by storing the same on suitable media. Thereafter the said information, documents, records may be deleted/removed from the website.

All information required to be uploaded on the Company's website in pursuance of any other statute/legislation/regulation, shall be hosted on the Company's website, in the form, manner and for such period as may be mandated by that statute/legislation/regulation, etc.

All information/documents hosted on the website of the Company voluntarily by the management shall be retained on the website/archive section for such period of time as may be deemed fit at the absolute discretion of the Management.

3. POLICY REVIEW:

In case there are any regulatory changes or other changes requiring modifications to the Policy, the Policy shall be reviewed and amended by Board of Directors of the Company. However, the amended regulatory requirements will supersede the policy till the time policy is suitably amended.

4. DISSEMINATION OF POLICY:

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

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