

AMINES & PLASTICIZERS LIMITED



POLICY ON PRESERVATION OF DOCUMENTS

Pursuant to Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”)

PREFACE :

In compliance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), the Board of Directors (“Board”) of Amines and Plasticizers Limited (“Company”) has approved the following Policy For Preservation of Documents (“Policy”) for the Company. The Policy shall be applicable on preservation of documents / records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “Documents”).

OBJECTIVE:

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.

TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION:

The company shall maintain and preserve documents as specified hereunder:

Category (A):

The documents of permanent nature shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

Category (B):

The documents of the company to be maintained and preserved for 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, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

For the purpose of this policy, document may include the following:

- i. ‘books and papers’ as defined in sub section 12 of section 2 of the Companies Act,2013;
- ii. ‘books of accounts’ as defined in sub section 13 of section 2 of the Companies Act,2013;
- iii. ‘documents’ as defined in sub section 36 of section 2 of the Companies Act,2013;
- iv. ‘registers’ as defined in sub section 74 of section 2 of the Companies Act,2013.

Further, the Company as may deem fit and possible from time to time maintain above mentioned documents in electronic form to the extent possible.

ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy and to report thereon to Audit Committee periodically. The Audit Committee of the Company shall periodically review report(s) from head of departments and decide the category for preservation of documents.

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.

COMMUNICATION

Copy of this policy duly approved shall be placed before the Board and circulated among all the Director of the Company for their necessary action. Human Resource and/or Administration Department are required to notify and communicate the existence and contents of this policy to the employees/ functional heads of the Company. The new employees shall be informed about the policy by the Human Resource and /or Administration department. This policy as amended from time to time shall be made available at the Web site of the Company.

ADHERENCE OF THE POLICY BY THE EMPLOYEES:

The Company expects from its Responsible Officers (i.e Head of the Departments who are responsible for relevant areas of the Company's operations) to understand and fully comply with this Policy and schedules, provided however that if it is believed, or the Company informs otherwise, that Company records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then the same be preserved until the Responsible Officers / Legal Department determines the records are no longer needed. That exception supersedes any previously or subsequently established destruction schedule for those records. If any employee believes that exception may apply, or have any question regarding the possible applicability of that exception, please contact the Responsible Officers / Legal Department. Further, in the event that the Company is served with any legal or statutory notice for any Document(s) from any of the statutory authorities or any litigation / proceeding is commenced by or against the Company, than the disposal of documents which are subject matter of such notice or litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Responsible Officers / Legal Department shall immediately inform relevant employees of the Company for suspension of further disposal of Documents.

PROCEDURE FOR DISPOSAL OF DOCUMENTS:

The Documents that are no longer required as per the time schedule prescribed in the Appendix A may be destroyed. The Responsible Officers may direct the relevant employees 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 the Documents in the format prescribed at Appendix B.

APPENDIX A

List of Documents to be preserved

a. Corporate Records

Sr. No.	Name of Documents	Preservation Period (in Years)
1.	Certificate of Incorporation of Company, Commencement of Business Certificate, Certificate of change of name (if any), Memorandum and Articles of Association as amended from time to time.	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.	Annual Returns	8
10.	Board Agenda and supporting documents	8
11.	Attendance Register	8
12.	Office copies of Notice of General Meeting and related papers	8
13.	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8
14.	Register of Debenture-holders	15 years after the redemption of debentures
15.	Index of debenture-holders	15 years after the redemption of debentures

b: All other documents

All other documents of the Company shall be maintained in compliance with the requirements of the applicable laws.

APPENDIX – B

Sr. No.	Particulars of documents destroyed	Date of destruction	Mode of Destruction	Initials of the Responsible Office
---------	------------------------------------	---------------------	---------------------	------------------------------------