

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL

1. Introduction

The Companies Act, 2013 (“Act”) and other previous company law (Companies Act, 1956, to the extent applicable) and the Rules (“Rules”) framed there under the Act contain provisions for maintenance of various documents including registers and records by the Companies, the place at which such documents are to be maintained and the period for preserving such documents.

The Securities and Exchange Board of India (“SEBI”) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) which is applicable to all listed entity effective from 1st December, 2015. The Listing Regulations will replace the existing Listing Agreements entered into by the Apcotex Industries Limited (“Company”) with the BSE Limited (BSE) and National Stock Exchange of India Limited (“Stock Exchanges”).

The SEBI Regulations for listed entities, inter alia, contain provisions for preservation of Documents and re-produced as under:

“Regulation 9: Preservation of Documents”

The 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 whose preservation period shall be not less than eight years after completion of relevant transactions.

2. Objective

The objective of this Policy is preservation of documents of Apcotex Industries Limited (the “Company” or “AIL”) in compliance with the requirements of listing regulations, Companies Act, 2013, Companies Act 1956 (to the extent applicable), Rules framed under the act and other Corporate laws applicable to the company.

3. Preservation Of Documents

1. As per the Policy, the Company shall maintain and preserve register and records, books and/or paper, books of accounts etc (“Documents”) as follows:
 - a) Documents to be preserved permanently;

As required under the provisions of the Act / Rules / Regulations, the documents which are required to be preserved on permanent basis shall be maintained and preserved by the Company permanently.

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- b) Documents to be preserved for eight years; and

As required under the provisions of the Act / Rules / Regulations, the documents which are required to be preserved for a period of eight years shall be maintained and preserved by the Company accordingly.

- c) Documents to be preserved for two years.

In cases of documents for which no period is specified under the Act / Rules / Regulations, such documents shall be maintained by the Company for a period of two financial years from the close of relevant financial year.

2. Documents to be maintained under this Policy shall be preserved in Physical or in Electronic Form/Mode as per the provisions of the Act / Rules / Regulations. For this purpose, the word “Electronic Mode / Form” shall have same meaning as defined under the Act / Rules, as the case may be.

4. Archival Of Material Events/Information Hosted On Website

The Regulation 30(8) of the Listing Regulations provides that the listed entity shall disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under the said Listing Regulations and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

The Company shall after making disclosure of the events or information to the stock exchange(s) also host such information on its website (www.apcotex.com).

The disclosures so placed on the website, shall be maintained for a period of five years on the website of the Company. The period of five years shall be reckoned from the date of such events or information being placed on the website of the Company for the first time.

Other material developments for events or information which are disclosed to the stock exchange(s) shall also be placed on the website of the Company for a period of five years.

All such events or information so disclosed on the website of the Company in pursuant to Regulation 30 of the Listing Regulations, shall be archived after the expiry of the five years from the date of such posting and moved to the location or placed under – “Historic Material Events/ Information”.

The events/information so archived under “Historic Material Events/ Information” shall be preserved for a further period of one year or till the time such events or information are resolved or closed, whichever is later.

5. Procedure for disposal of Documents

The documents kept and preserved by the Company under this Policy for the respective periods may be destroyed after the expiration of such period as per the provisions of the Act / Rules / Regulations. In absence of such provisions, such documents shall be destroyed after obtaining approval of the Managing Director by the concerned Departmental Heads to which such document(s) relates.

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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 of the Documents in the format prescribed at Annexure A.

6. Suspension of Documents disposal in the event of Litigation or 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, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

7. Communication of this Policy

This Policy will be communicated to all Directors and employees of the Company. This Policy shall also be posted on the web-site of the Company.

8. Amendment

This Policy may be modified, amended, edited or substituted by the Board of directors to align with any statutory changes / modifications / amendments as may be required, from time to time.

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Annexure – A

Specimen format of the register of documents disposed of / destroyed

Serial No.	Particulars of documents destroyed	Date and mode of destruction	Initials of authorised person