

BALAJI SPECIALITY CHEMICALS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

& ARCHIVAL PROCESS

CONTENTS

1. Preamble.....	3
2. Objective	3
3. Applicability	3
4. Definitions	3
5. Classification of Documents.....	5
6. Archival Process for The Documents	7
7. Destruction/Disposal of Documents	8
8. Location of the Records.....	8
9. Monitoring And Evaluation of The Policy	8
10. Policy Review	9
11. Disclosure	9

PREAMBLE

In terms of the provisions of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), read with Regulation 30(8) of the Listing Regulations, all the listed companies are required to formulate a policy on preservation of documents and archival process thereof.

OBJECTIVE

The Board of Directors of Balaji Speciality Chemicals Limited (**‘the Company’**) at its Meeting held on June 1, 2022, has adopted this Policy for Preservation of Documents & Archival Process relating to its Corporate Entity and also various Registers, Forms, Returns, Statements and other Documents pertaining to its various functions and business operations. The Policy also deals with the process of archiving the aforesaid documents.

Preservation of Documents has been a requirement under various statutes, as evidence in a legal process, audit purposes or management requirements. Therefore, the objective of this Policy is to provide a framework for preservation of documents maintained by the Company under various applicable laws, back up the important data and eliminate the possibility of accidental or innocent destruction.

APPLICABILITY

This Policy shall come into force from the date of listing of equity shares of the Company on the stock exchanges.

DEFINITIONS

In this Policy unless the context otherwise requires,

“Act” means the Companies Act, 2013 or the Securities and Exchange Board of India Act, 1992 or any statutory modification or re-enactment thereof and includes any Rules and Regulations framed thereunder, as the case may be in respect to the reference made in the provisions under this Policy;

“Articles” means the Articles of Association of the Company, as modified from time to time;

“Authorized Person” means any person duly authorized by the Board, Managing Director or any Executive Director of the Company.

“Board of Directors” or “Board” means the collective body of the Directors of the Company;

“Books of account” means as defined in the Act;

“Committee” means a Committee of the Board;

“Current Document(s)” means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceeding, compliant, dispute, contract, or any like matter;

“Document” means all papers, files, books of account, certificate, summons, notice, license, requisition, order, declaration, confirmation, evidentiary record, electronic record, electronic mail, instrument, statements, agreements, deeds, permissions, press release, returns, official publication, report, policies, record, form, register, voucher, ledger, minute book, Floppies, CDs, DVDs, Electronic Storage Devices, etc whether issued, sent or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic mode;

“Electronic mail” means the message sent, received or forwarded in digital form using any electronic communication mechanism that the message so sent, received or forwarded is storable and retrievable;

“Electronic mode” means data sent, received or forwarded is storable and retrievable using electronic medium;

“Electronic record” means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000;

“Key Managerial Personnel (KMP)” shall include:

- The Managing Director
- The Chief Executive Officer
- Whole-time Director
- The Company Secretary
- The Chief Financial Officer
- Any other person as defined under the Companies Act, 2013 and as per SEBI and changes made from time to time.

“Maintenance” means keeping document(s), either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such documents;

“Meeting” means a meeting, duly convened and constituted, of the Board or any committee thereof or of the Members of the Company;

“Member” means any person who agrees, either by subscribing to the Memorandum of Association of the company or by applying in writing, to become a member of the company and whose name is entered either in the Register of Members of the Company or in the records of the Depository as a beneficial owner in respect of the equity shares of the Company held by him;

“Preservation” means to keep in good order; to prevent from being damaged or destroyed;

“Record” means documentary evidence of past events or transactions;

“Register” means a register maintained under the Act and includes registers referred to in this Policy;

“Senior Management” shall mean officers/personnel of the listed entity who are members of its core management team excluding board of directors and normally this shall comprise all members of

management one level below the chief executive officer/managing director/whole time director (including chief executive officer/, in case they are not part of the board) and shall specifically include company secretary and chief financial officer.

CLASSIFICATION OF DOCUMENTS

Documents of the Company which are to be preserved are classified into the following categories:

1. Documents which shall be preserved be permanent; and
2. Documents which shall be preserved for a period of not less than 8 years from the date of completion of relevant transactions.

Detailed classification of documents to be preserved

Serial No.	Document Category	Document Type	Preservation requirement	Under the custody of
I.	Corporate/ Organizational	<ul style="list-style-type: none"> • Certificate of Incorporation; • Memorandum of Association; • Articles of Association; • Statutory Licenses, Registrations and Permits; • Permanent Account Number Card. 	Permanent	Company Secretary
II.	Directors/ Key Managerial Personnel/Senior Management	<ul style="list-style-type: none"> • Consent to act as a Director (Form DIR-2); • Notice of disclosure of interests (Form MBP-1); • Intimation of disqualification, if any (Form DIR-8); • Disclosures made under SEBI (Prohibition of Insider Trading) Regulation, 2015; • Resignation Letters; • Service Agreements/Letter of Appointment; • Correspondences with the Directors 	Up to eight years from the date of resignation/cessation of the concerned person	Company Secretary
III.	Finance & Accounting	<ul style="list-style-type: none"> • Audited Financial Statements and related documents; • Auditors Reports. 	Permanent	Company Secretary or Accounts Head
		<ul style="list-style-type: none"> • Unaudited Financial Statements and related documents; • Books of accounts and vouchers; • Management Letters; • Investment Statements; • Cost Records; • Bank Statements. • Sanction letters and agreements with Banks and financial institution; • Forex transactions; • Income tax Returns; • Tax deduction records; • Records relating to Customs; • Records relating to payment of gratuity; • Details of Related Party Transactions; • Remittance Register; 	Up to eight years from the date of document	

		<ul style="list-style-type: none"> • Fixed Asset Register. 		
IV.	Share & Secretarial	<ul style="list-style-type: none"> • Annual Reports; • Listing Agreement with the Stock Exchange(s); • Tripartite Agreement with the Depositories and the Registrar and Share Transfer Agent (RTA) of the Company; • Agreement with the RTA; • Prospectus; • Documents related to declaration of Interim and Final Dividend; • General Meeting Minute Book; • Board Meeting/Committee Minute Book; • Resolutions passed by the Board/Committee in Circulation and related documents; • Statutory Registers; • Company Policies/Charters/Bye laws; • Secretarial Audit Report and the related documents; • Annual Return and related documents; • Forms (including e-forms), returns and documents including agreements, receipts, undertakings, affidavits with the Registrar of Companies, Regional Director, Ministry of Corporate Affairs, Government of India, Central government and/or any other Statutory Authority(ies). 	Permanent	Company Secretary
		<ul style="list-style-type: none"> • Investor Grievance correspondences; • Correspondences with Statutory Authority(ies); • Records from the RTA; • General Meeting Notices; • Documents relating to Postal Ballots; • Attendance Register; • Leave Register; • Board Meeting/Committee Meeting Notices; • Board Meeting/Committee Meeting Agenda Papers; • Board Presentations; • Certified Extracts from the Minute Book; • Instrument creating a charge including modification and satisfaction thereof; • Newspaper publications. 	Up to eight years from the date of document	Company Secretary
V.	Provident Fund	<ul style="list-style-type: none"> • Records relating to Employees' Provident Fund; • Accounts & Returns submitted to Regional Provident Fund Office; • Electronic Challan Receipts (ECR). 	Eight years	Chief Human Resource Officer or Accounts Head
VI.	Legal	<ul style="list-style-type: none"> • Property Records; • Documents related to the Acquisition and Sale of Property; • Records related to development of intellectual property including Patent, Trademark, Copyright or Trade Secret; • Records of efforts not to Infringe any Patent, Trademark, Copyright or Trade Secret; • Lease and Sale Agreements, Rent Agreements; 	Permanent or as per requirement of law	Property Agreements- Company Secretary Others- Legal Team

		<ul style="list-style-type: none"> • Non-Disclosure Agreements; • Contracts, Agreements (unless specifically addressed elsewhere in this policy), Deeds, Licenses; • Documents related to past/ongoing litigations. 		
VII.	Human Resource	<ul style="list-style-type: none"> • Official files of present employees; • Official files of ex-employees; • Payroll records; • ESOP Documents. 	Eight years	CHRO
VIII.	Insurance	<ul style="list-style-type: none"> • Insurance policies; • Documents relating to Insurance claims, settled and pending. 	Eight years	–Accounts Head
IX.	General	<ul style="list-style-type: none"> • Press Releases; • Documents & Agreements with Media Company, PR Agency. 	Eight years	Marketing Team

ARCHIVAL PROCESS FOR THE DOCUMENTS

The disclosures made to the Stock Exchanges under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be hosted on the website of the Company for a period of five years from the date of its disclosure. Disclosed Information which was over five years old will be archived from the website of the Company for another period of three years by storing the same on suitable media. Anyone intending to review that Disclosed Information may write to Compliance Officer of the Company. Thereafter the said records shall not be destroyed or purged without requisite permission of the respective functional heads who are authorized to preserve such documents.

However, for any disclosure of event which is the subject matter of any ongoing litigation and/or required to be preserved in terms of applicable provisions of Law/Statute, such disclosure shall continue to remain on the website of the Company irrespective of its duration thereat.

DESTRUCTION/DISPOSAL OF DOCUMENTS

- a) Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.
- b) The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice.
- c) The documents mentioned in this Policy, kept by the Company, may be destroyed after the expiry of the minimum retention period. However, in the case of pending matters/ litigation/ disputes, the documents shall be preserved till the resolution of pending matter/ litigation/ dispute. A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.

d) The entries in the register shall be authenticated by the Authorised Person(s).

LOCATION OF THE RECORDS

The overriding principle guiding the choice of location of records is that they will continue to be available to Management on a timely basis. The following principles will be considered for selecting the record location:

- The records and data are available to management on a timely and reasonable basis
- Adequate back-up facilities will be made available for electronically stored data
- Accessibility of the record location from the point of view of audit, internal and external auditors
- Secrecy and confidentiality of data to be maintained.
- Safety of Records both in house and third party (with economy in cost)

MONITORING AND EVALUATION OF THE POLICY

This Policy will be reviewed by the Board from time to time and if required, modify the same in order to comply with the statutory requirements and also to incorporate the best industry practices.

POLICY REVIEW

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for approval and noting at a meeting of the Board.

DISCLOSURE

The necessary disclosure about the policy, if any, will also be made as per requirements of SEBI LODR Regulations and the Companies Act 2013.
