



Policy for Preservation and Archival of Documents
Aarti Surfactants Limited

Compliance Department



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POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

1. Objective

- 1.1. The objective of this policy is to lay down the time frame and principal for preservation and archival of documents and records.

2. Regulatory Framework

- 2.1. Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires listed entities to have a policy on Preservation of documents approved by its Board of Directors, classifying the documents in at-least two categories, as follows:-
 - i. Documents whose preservation shall be permanent in nature
 - ii. Documents with preservation period of not less than eight years after completion of the relevant transactions
- 2.2. Regulation 30 (8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires listed entities to have an archival policy prescribing the manner and period for hosting events or information on the website of the Company.
- 2.3. Accordingly, this policy is framed as per the requirements of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

3. DEFINITIONS

- 3.1. **“Act”** means the Companies Act, 2013 and rules made thereunder as amended from time to time.
- 3.2. **“Archival”** means accumulation/storage of historical records on server/network or at a physical place.
- 3.3. **“Company”** means **“Aarti Surfactants Limited”**
- 3.4. **“Document(s)”** means papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondences, minutes, indices, registers and or any other records, required under or in order to comply with the requirements of any Applicable law, whether issued, sent or received or kept in pursuance to the Act or any under any other law for the time being in force or

otherwise, maintained on paper or in Electronic form and does not include multiple or identical copies.

- 3.5. **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub – section (1) of Section 2 of the Information Technology Act, 2000.
- 3.6. **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it .
- 3.7. **“Maintenance”** means keeping documents, either physically or in electronic form
- 3.8. **“Preservation”** means to keep in good order and to prevent form being altered, damaged, destroyed or tampered.
- 3.9. **“Listing Regulations”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The word and phrases used in this Policy and not defined here shall derive their meaning from Applicable Law.

4. Policy

4.1. Preservation of Documents

- i. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards and the Listing regulation and any all other applicable law, rules, regulations, internal policies of the Company.
- ii. All the documents and records stated in **Annexure A** to this Policy shall be preserved permanently by the Company.
- iii. All the documents and records stated in **Annexure B** to this Policy shall be preserved for not less than 8 years or such other longer period as may prescribed under applicable laws/rules/regulations for the time being in force and thereafter the records can be destroyed.

- iv. 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 other than those mentioned above shall be preserved accordingly.
- v. The Company shall adhere to the applicable provisions of law/rules/regulations with regard to the manner of maintenance of records.

4.2. Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations

- i. The Company shall host on its website, information and documents which are required to be hosted as per the Companies Act, 2013 and Rules framed thereunder, SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (the “ Listing Regulations”) and other applicable laws, rules and regulations.
- ii. The Company shall host the above information and documents on its website for a continuous period of five years from the date of hosting.
- iii. Information and/or documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers.

4.3. Archival of Documents made available on the website of the Company:

After the expiry of time mentioned in Clause 4.2 (ii) of this policy (i.e. five years from the date of hosting), the information and/or document shall be removed from the main website. The Backup of said information and/or document which is removed from the main website shall be maintained/ preserved in the server for a minimum period of 1 years and after expiry of this period of 1 years the backup may be permanently removed from the server.

4.4. Destruction of documents mentioned in Clause 4.1 and 4.2 of this Policy

Any of the documents mentioned in Clause 4.1 and 4.2 of this Policy, which are not required to be maintained and preserved permanently shall be destroyed.

If documents / records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time,

space and equipment use. The documents/ records referred to in Annexure B shall be preserved for at least 8 years (or additional period decided by the Company) may be disposed of after the expiry of the periods of their preservation, after obtaining approval from the Managing Director.

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:

- i) Item Number;
- ii) Brief Particulars of the records disposed of;
- iii) Date of approval for disposal of records;
- iv) Date of disposal; and
- v) 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. REVIEW AND AMENDMENT:

- 5.1. The Policy would be subject to revision/amendment in accordance with the applicable laws
- 5.2. The Company reserves its rights to alter, modify, add, delete or amend any of the provisions of this policy.
- 5.3. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being 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.

Annexure A

Documents/Record whose preservation shall be permanent in nature

Sr. No.	Documents/Records
1.	Certificate of incorporation
2.	Memorandum and Articles of Association
3.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
4.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
5.	Register and Index of Members, debenture-holders, if any or other security holders, if any
6.	Register of Contracts as per Companies Act, 2013
7.	Register of Charges as per Companies Act, 2013
8.	Register of Investments as per Companies Act, 2013
9.	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10.	Authorization / licenses obtained from any statutory authority
11.	Policies of the Company framed under various regulations
12.	Register of disposal of records
13.	Such other records as may be required under any law from time to time

Annexure B

Documents/Record to be preserved for a minimum period of eight years

Sr. No.	Documents/Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Annual Returns as per Companies Act, 2013
3.	Disclosure/Return filled under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015
4.	Register of Deposits as per Companies Act, 2013
5.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
6.	Annual financial statements including: - Annual accounts - Directors report - Auditors report
7.	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013
8.	Income Tax Returns filed under Income Tax Act, 1961
9.	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
10.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
11.	Copy of newspaper advertisement or publications
12.	Compliance Reports received from any statutory authority
13.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
14.	Disclosure/Return filled under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015