

**INDIA PESTICIDES LIMITED**

Preservation & Archival

Policy

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Document Control Log

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Action	Name	Designation & Department	Date
Prepared by	Ramakrishnan Subramoniam	Quality Assurance Manager	28/12/2020
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1. INTRODUCTION

The Board of Directors (“**Board**”) of India Pesticides Limited (“**IPL**” / “**the Company**”) has approved the Policy for Preservation & Archival of the Company’s Documents.

This policy is in line with complying of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI Listing Regulations**”):

❖ **Regulation 9** on preserving documents

Preservation of documents

9. 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 with preservation period of not less than eight years after completion of the relevant transactions: Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

❖ **Regulation 30(8)** on disclosure of events or information

Disclosure of events or information

30. (8) The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation , 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.

2. OBJECTIVE

The objective of this Policy is to have a requisite framework for the preservation & archival of the company’s documents, which facilitate:

- ⊕ Identification of records that are to be maintained permanently for a limited period of time
- ⊕ Accessibility of maintained documents at all reasonable times
- ⊕ Deciding the mode of preservation of documents, whether in physical form or in electronic form

3. DEFINITIONS

TERMINOLOGIES USED	DEFINITION/MEANING IN THIS DOCUMENT
Applicable Law	Any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (“SEBI”) and Ministry of Corporate Affairs (“MCA”)
Board of Directors or Board	The Board of Directors of India Pesticides Limited, as constituted from time to time
Books of Accounts	As defined in Section 2(13) of the Companies Act
Company	Shall mean India Pesticides Limited
Documents	Records maintained by the Company either in physical mode or electronic mode, as required to be maintained under any law or regulation for the time being in force
Maintenance	Keeping documents, either physically or in Electronic Form
Preservation& Archival	Keep in good order to prevent from being altered, damaged or destroyed and reasonably accessible
SEBI Listing Regulations	The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time

4. CLASSIFICATION OF DOCUMENTS

The classification of documents for the purpose of preservation shall be done as under:

- a) Where there is a period for which a document is required to be preserved as per applicable law(s), for the period required by the applicable law(s).
- b) Where the period for preservation of documents has not been prescribed under the applicable law(s), till such period these documents have relevance with reference to any ongoing litigations, proceedings, complaints, disputes, contracts or any like matter.

Documents whose preservation shall be **permanent in nature** in the archives of the company are listed in **Annexure – A**.

Documents whose preservation shall be for **different time periods**, however for not less than three years, eight years or more after completion of relevant transaction and miscellaneous are listed in **Annexure – B**.

5. MANAGEMENT OF DOCUMENTS

The preservation of documents is managed to ensure that there is:



- ⊕ No Tampering
- ⊕ No Alteration
- ⊕ No Destruction

OR

⊕ Anything which endangers the:

- Content
- Authenticity
- Utility
- Accessibility of the documents.

The Heads of the respective departments of the Company shall be responsible for maintenance of the documents.

6. DISPOSAL AND DESTRUCTION OF DOCUMENTS

Disposal and destruction of documents will be done by the respective departments, post the required timeframe after the approval of department head. The activity is done by the delegated person as directed by the department head. The activity will be documented with information on date, time, name of the person approved & disposed and way of disposal.

7. ARCHIVAL OF INFORMATION

A. For events or information disclosed under Regulation 30 (8) of SEBI Listing Regulations

All events or information disclosed under Regulation 30 (8) of SEBI Listing Regulations and any other Regulations to the Stock Exchanges on which the Company is listed and hosted on the Company's website shall be available on the Company's website for a period of five (5) years or for such period as may be mandated under law from the date of uploading of the same on the website.

However, if the disclosure requires a longer storage, the same will be considered appropriately.

On a quarterly basis all announcements/ disclosures on the website of the Company would be moved to the archival folder after a period of five (5) years from the date on which such disclosures/ announcements were made. The archived folder would be available for a period of one or two (1 or 2) years.

B. For disclosures made under other statutes/legislations

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.

In cases where the concerned statute / legislation / regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of one (1) year from the date of uploading or more if deemed necessary.

C. Removing records from website

Any information/ form/ return/ document etc. disclosed on the Website as per A or B above may be removed/ deleted from the website after such disclosure period.

D. Archiving

Post the disclosure period, the records removed from the website shall be placed in electronic archives. Depending upon the criticality/ importance of records being removed, the Company may retain those records having long term value in the archives for permanent/ specified period storage and to suitably deal with the records accordingly.

8. MODIFICATIONS

Any changes 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 and / or modify 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 mandatory.

9. GENERAL

- Where the terms of this Policy differ from any existing or newly enacted law, rule, or regulation, the law, rule or regulation will take precedence over this Policy from the effective date of such law, rule or regulation.
- For interpretation of this Policy, reference and reliance may be placed upon circulars/clarifications issued by the MCA, SEBI and/or any other authority.

ANNEXURE – A
Preservation – Permanent in Nature

Corporate Records			
01	Common Seal	08	Statutory forms except for routine compliance
02	Registration Certificate	09	Scrutinizers Report
03	Constitutional documents i.e. Memorandum and Articles of Association of the Company	10	Register of Member
04	Affidavit from the subscribers to the memorandum and from person named as the first directors	11	Index of Members
05	Minutes' Books of Board, General Meetings and Committees Meetings	12	Audited Financial Statements
06	Statutory Registers	13	Documents related to purchase of shares/investments in an entity
07	License and Permissions	14	Books and documents relating to issue of share certificate, including blank forms of share certificates
Accounts and Finance			
01	Annual Audit Reports and Financial Statements	03	Internal/Cost audit Reports
02	Subsidiary's Account	04	Compliance/Secretarial Audit Report
Tax Records			
01	Tax Exemption and Related documents	02	Tax Bills, receipts and payments
Legal Files and Records			
01	Court Orders	03	Trade Mark / Copy Rights / Patents
02	Business / Joint Venture / Sales Purchase Agreement / Loan / Lease Agreements		
Property Records			
01	Original Purchase and Sale Agreement	03	Property Insurance
02	Property Card, Index II, Ownership records issued by Government Authority		
Projects			
01	Project Documents and Related correspondence (including any proposal of the Project and its approval)	02	The documents containing the terms and conditions regarding operation and management of manufacturing units
Correspondence and Internal Memo			
01	Those pertaining to non-routine matters or having significant lasting consequences		
Insurance Records			
01	All Insurance Policies		
Personnel Records			
01	Payroll Registers	02	Bonus, Gratuity and other Statutory Records
Agreement			
01	Material Agreements/Contracts		

ANNEXURE – B

Preservation – For different time periods

(All not less than 3 years or 8 years or more after completion of relevant transaction and miscellaneous)

Corporate Records			
01	Annual Returns and other Forms filed with MCA	08	Correspondence with Department/Shareholders
02	Board Agenda and supporting documents	09	Certificates surrendered to a Company
03	Attendance Register	10	Instrument creating a charge or modification
04	Office copies of Notice of General Meeting and related papers	11	Any other documents which have been so decided to be preserved by the Function/Department Heads, either under their own respective judgments or as required to be preserved by any specific Law
05	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	12	Miscellaneous – Register of debenture-holders, if any (15 years after the redemption of debentures)
06	All notices pertaining to disclosure of interest of directors	13	Miscellaneous – Index of debenture-holders, if any (15 years after the redemption of debentures)
Accounts and Finance			
01	Annual Plans and Budgets	05	Investment Records
02	Books of Accounts, Ledgers and Vouchers	06	RBI Returns
03	Sales Invoice & Purchase Invoice	07	Foreign Trade documents
04	Bank Statements	08	Miscellaneous – General Correspondence
Tax Records			
01	Excise/Customs Records	04	Income Tax Papers and Service Tax papers
02	Tax Deducted at Source Records	05	VAT / CST / State Sales Tax
Legal Files and Records			
01	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	02	Miscellaneous – Legal Memoranda, Opinions including subject matter files and Litigation Files
Correspondence and Internal Memo			
01	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences. For example; <ul style="list-style-type: none"> ➤ Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; ➤ Letters of general enquiry and replies that complete the cycle of correspondence; 		
Insurance Records			
01	Journal Entry support data	04	Claims records (Till settlement is over and claim money is received)
02	Inspection Reports	05	Group Insurance Plans (Until plan is amended or Terminated)
Personnel Records			
01	Time office/HR Records and Leave Applications	04	Statutory Returns /Reports
02	Unclaimed Wages Records	05	Miscellaneous – Employees Medical Record
03	Employees Information Records		
Electronic Records			
01	Electronic mails (e-mails)		
02	Internet cookies of Web Page files		

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