

# **POLICY FOR PRESERVATION OF DOCUMENTS**

## **1. BACKGROUND**

Saboo Sodium Chloro Limited (the Company) is committed to being open and transparent with all stakeholders and believes in disseminating information in a fair and timely manner. The Company's securities are listed on the BSE Limited (BSE) and the Company must comply with the continuous disclosure obligations imposed by the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 (Listing Regulations).

The Listing Regulations is effective from December 1, 2015. SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 (Listing Regulations) mandate listed entities to formulate a Policy for preservation and archival of documents and in this context that the Policy for preservation and archival of documents ("Policy") is being framed and implemented.

## **2. OBJECTIVE OF THIS POLICY**

According to the Regulation 9 of Chapter II of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 (Listing Regulations), the listed entities should have a policy for preservation of documents, 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 entities may keep documents specified in clauses (a) and (b) in electronic mode.
- Company may archive the documents after completion of transaction or may destroy it according to its requirement.

## **3. RECORD MAINTENANCE AND STORAGE**

All records in physical form are to be maintained by the Records/Respective Department(s) at the respective locations. Electronic version(s) of all of records are to be maintained within the Company's centralized electronic record software database, which is maintained by the IT Services Department.

## **4. DISPOSAL OF RECORDS**

Physical records disposed of pursuant to the retention periods specified in the Document Retention Schedule shall be disposed of using a cross-cut shredder. The Records Department

shall adopt appropriate procedures to permanently dispose of any non-paper physical records, such as photographs or audio/video recordings. In the event that it is necessary to manually dispose of an electronic record, the IT Department shall use the “permanent delete” function to permanently dispose of electronic records.

**5. COMPLIANCE TO THE POLICY**

The company is required to maintain certain types of records for specified period of time, failure to do so could subject the company and its employees to serious legal consequences.

All employees are expected to fully comply with this policy. Generally, all corporate records are to be retained for specified time and can be destroyed thereafter, but in case, if an employee believes or the company requires that, company records are relevant to litigation, then these records need to be preserved until the legal department advises otherwise.

**6. EFFECTIVE DATE**

This policy as approved by the Board of Directors shall be effective form December 01, 2015.

**7. DISCLOSURES**

This Policy shall be disclosed on the Company’s website and a web link thereto shall be provided in the Annual Report of the Company.

**8. AMENDMENT**

This Policy may be amended by the Board from time to time as and when deemed appropriate.

**Encl. below: Annexure I**

## Annexure I

➤ **Documents whose preservation shall be permanent in nature**

1. Registration Certificates
2. Licenses & Statutory Approvals
3. Statutory Registers required under applicable laws
4. Audited financial statements
5. Minutes of General Meeting
6. Minutes of Board Meeting
7. Minutes of various Committee Meetings
8. Material Agreements/Contracts
9. Orders issued by Courts/Statutory bodies
10. Investment Documents/proofs including certificates etc.
11. Press Releases
12. Intellectual Property Records
13. Any other document as may be required to maintain permanently in terms of applicable Law maintained and preserved from time to time.

➤ **Documents with preservation period of not less than eight years after completion of the relevant transactions**

1. Books of Accounts
2. Annual Return(s)
3. Personnel Documents
4. Insurance Policies/ Claims under various policies
5. Correspondences with Departments/shareholders
6. Non-Statutory Registers/Documents
7. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.