

GUJARAT POLYSOL CHEMICALS LIMITED

CIN No. U24231GJ1989PLC012892

Regi Office Address: Plot No. 1734, Third Phase, GIDC, Vapi,
Dist. Valsad, Vapi, GJ 396195 IN

Email Id: gujaratpolysol@gmail.com, Contact No. +91 99251 00331

POLICY ON PRESERVATION OF DOCUMENTS

1) PREAMBLE:

The purpose of this document is to present a Policy of **Gujrat Polysol Chemicals Limited (Company)** regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**LODR**). As per Regulation 9 of the LODR, every listed company is required to have a policy for preservation of documents approved by its Board of Directors, classifying them as documents whose preservation shall be permanent in nature and documents with preservation period of not less than eight years after completion of relevant transactions.

In light of the above, Company has framed this "Policy on Preservation of Documents" (**Policy**).

2) OBJECT:

The object of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

3) SCOPE:

This Policy is applicable to all departments of the Company. It ensures that the Company maintains and preserves both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

4) DEFINITIONS:

"**Act**" means the Companies Act, 2013 & rules made thereunder.

"**Applicable Law**" means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

"**Board**" means the Board of directors of the Company

"**Electronic Record(s)**" means the electronic record as defined under section 2 (1)(t) of the Information Technology Act, 2000.

"**Document**" includes summons, notice, requisition, order, declaration, form and register, 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 physical or in electronic form.

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“**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.

“**Maintain**” means keeping Documents, either physically or in Electronic Form.

“**Preserves**” means to keep in good order and to prevent from being altered, damaged or destroyed.

“**Regulations**” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (LODR).

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other applicable law or regulation, amended from time to time.

5) MODE OF PRESERVATION

The Documents may be preserved in physical form or electronic form. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

6) POLICY:

Taking into account the aforesaid provisions and other applicable legal provisions, the Policy on Preservation of Documents (“Policy”), to the extent applicable to the Company, is being made as under:

- i. Documents whose preservation shall be permanent in nature as per **Annexure-A;**
- ii. Documents with preservation period of not less than eight years after completion of the relevant transactions, as per **Annexure-B.**
- iii. The documents referred to above may be maintained in physical or electronic mode.
- iv. Custody of all such registers / records / Documents, except books of accounts, shall be with the Company Secretary of the Company or such other person as may be specifically authorized by the Board of Directors for the purpose. Custody of books of accounts shall be with the Chief Financial Officer of the Company or such other person as may be specifically authorized by the Board of Directors for the purpose.
- v. Back-up of the records maintained in electronic mode may be taken on a periodic basis.
- vi. The documents after the expiry of the stipulated period for preservation, may be destroyed / extinguished with approval from the Chairman or Managing Director or any other Whole-time Director/Executive Director and a register shall be maintained in an appropriate form, in physical or electronic mode, wherein brief particulars of the documents destroyed shall be entered.
- vii. The Policy shall be periodically reviewed and brought in conformity with statutory and regulatory requirements, as and when required.

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- viii. In any circumstance where the provisions of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the relevant law, rule, regulation or standard will take precedence over this Policy until such time as this Policy is changed to conform to the said law, rule, regulation or standard.
- ix. The Board is authorized to amend or modify this Policy in whole or in part as and when deemed necessary, to stipulate further guidelines, procedures and rules, from time to time.
- x. This policy shall be placed on the Company's website www.gujaratpolysol.com.

7) APPROVED AND ADOPTED

This Policy has been adopted by the Board of Directors of the Company in its meeting held on February 14, 2022 and the Policy shall be effective from February 14, 2022.

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ANNEXURE A

Illustrative list of documents & records whose preservation shall be permanent in nature.

1. Memorandum of association and Articles of association;
2. Certificate of incorporation;
3. Minutes books of board meetings, general meetings and committees' meetings;
4. Statutory registers, maintained under the Companies Act, 2013, as amended from time to time;
5. Licenses and key approvals from the statutory authorities
6. Annual reports;
7. Policies, charters and codes of the company;
8. Property documents owned by Company;
9. Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded;
10. Copyrights, trademarks, industrial designs and patents etc., if any, owned by company;
11. All other documents which are required to be preserved permanently in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars, and notifications etc. as may be applicable to the Company from time to time.

All modifications, amendments, additions, deletions to the above documents shall also be preserved permanently by the Company.

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ANNEXURE B

Illustrative list of documents & records to be preserved for not less than eight years after completion of the relevant transaction(s):

1. Books of accounts and tax records viz. documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax authorities, shall be maintained for a period of 8 (eight) years from end of the relevant assessment year or till the disposal of the appeal against any demand by the highest authority, whichever is later;
2. Attendance registers, notices, scrutinizer's report, agenda, notes to agenda and other related papers of general meetings, board meetings and various committee meetings;
3. Disclosures of interest received from directors;
4. Copy of filings and returns that are not permanent in nature, under the provisions of the Companies Act 2013 / SEBI Regulations / other laws;
5. Employment / Personnel record in case of employees of the company;
6. All press releases and publicly filed documents;
7. Legal memoranda and opinions;
8. All contracts shall be retained for a period of 8 (eight) years after the expiry of the term of the contract unless such contract has been a subject matter of dispute in which case the contract and all other related communications/documents shall be preserved for a period of 8 (eight) years after such dispute has been finally adjudicated and the order / judgment cannot be superseded or has not been appealed against within the limitation period;
9. In case any document is required for the purpose of any legal dispute, litigation, proceedings etc. such records shall not be disposed-off and shall be maintained for a minimum period of 8 years from the date of final conclusion of such legal dispute, litigation or proceedings etc;
10. All other documents which are required to be preserved for not less than 8 years in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars, and notifications etc. as may be applicable to the Company from time to time.

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