

POLYPLEX CORPORATION LIMITED

(CIN : L25209UR1984PLC011596)

Regd. Office : Lohia Head Road, Khatima 262 308, Distt. Udham Singh Nagar, Uttarakhand

POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

[Under Regulation 9 and Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. PREFACE

The Board of Directors (the "Board") of Polyplex Corporation Limited (the "Company") has approved the following Policy ("The Policy") of the Company for preservation and archival of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as "the Documents"). This Policy has been formulated in accordance with the Regulation 9 read with Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

2. PURPOSE OF THE POLICY

The purpose 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 archived or 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.

As a general principle, a document should be permanently preserved, even beyond the requirements of Applicable Law, where the Document has a particular legal, historical or business significance and is of such nature that it should be available to the Company for the long term.

As a general rule, a particular Document shall be considered to belong to a particular department if it originated in such department or if it comes under the scope of responsibility of the head of department of such department. In case a Document is part of two or more departments or if there is ambiguity as to the department to which a particular Document belongs, the matter may be referred to the Chief Executive Officer , whose decision shall be final.

3. ADMINISTRATION

Attached as **Appendix A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Chief Executive Officer of the Company, (CEO) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The CEO is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

4. PROCEDURE FOR DISPOSAL OF DOCUMENTS

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

Employees shall exercise due diligence while destroying any Documents, including seeking confirmation from other relevant departments or external consultants, to the extent necessary.

The Documents of the Company which are no longer required as per the time schedule prescribed in the Appendix A may be destroyed. The CEO may direct Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under **Appendix A**. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by the concerned Departmental Head/ Designated Officer who are disposing of the Documents in the format prescribed at **Appendix B**.

5. ARCHIVING OF DOCUMENTS WHICH ARE HOSTED ON THE COMPANY'S WEBSITE

Recognizing the need to ensure the preservation and availability of the Documents of the Company after their required preservation period as set out under the Regulations and hereunder, for any legal, administrative, and historical purposes, the Company adopts the following archival policy in respect of Documents which are hosted on the website of the Company:-

All Documents generated, disclosed or received by the Company, on its website are the properties of the Company and constitute archival material.

Archived material of the Company shall not be destroyed or purged without the approval of the CEO. Provided that this shall not apply in case of an accidental deletion, or deletion due to any system flaw, virus, or any other deletion, inaccessibility or loss due to any reason other than deliberate and determinate deletion.

Archiving of the Documents to be submitted to the stock exchange, in terms of the Regulations, shall be done after the lapse of the preservation period of 5 years, as per the archival policy.

For the Documents to be submitted to the stock exchange to comply with disclosure norms as required by any other Applicable Law, the Documents are to be archived after the lapse of the specified/required time period.

Material so selected for Preservation shall be sent to the Company archives.

The CEO will be responsible for deciding how long archived material is to be retained after the minimum period of five years, if the law or this Policy does not specify any time period.

6. SUSPENSION OF DOCUMENTS DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The CEO shall immediately inform all concerned employees of the Company for suspension of further disposal of Documents.

7. COMMUNICATION OF THIS POLICY

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be circulated within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

8. AMENDMENT

Any change 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 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 binding.

9. INTERPRETATION

In any circumstance 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 until such time as this Policy is changed to conform to the law, rule or Regulation.

10. APPROVAL OF THE POLICY

This Policy has been approved by the Board of Directors in its meeting held on December 26, 2015.

POLYPLEX CORPORATION LIMITED

POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

Appendix - A

DOCUMENTS PRESERVATION SCHEDULE

- 1. Corporate Records**
- 2. Finance and Accounts Records**
- 3. Direct Taxes Records**
- 4. Indirect Taxes Records**
- 5. Intellectual Property/ R&D Records**
- 6. Immovable Property Records**
- 7. Insurance Records**
- 8. Project Records**
- 9. HR & Personnel Records**
- 10. Administration Department Records**
- 11. Purchase Department Records**
- 12. Marketing Department Records**
- 13. Documents at Plant**
- 14. Litigation Records**
- 15. Correspondence & Internal Memoranda**
- 16. Electronic Records**

1. Corporate Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Minute Books of Committee(s), Board and General Meetings.	Permanent	C.S.
2	Statutory Registers	Permanent	C.S.
3	Statutory Forms except for routine compliance	Permanent	C.S.
4	Scrutinizers Reports	Permanent	C.S.
5	Register of Members	Permanent	Registrar & Transfer Agent
6	Index of Members	Permanent	Registrar & Transfer Agent
7	Listing Agreements with Stock Exchanges	Permanent	C.S.
8	Prospectus/ Offer Letters	Permanent	C.S.
9	Notices convening Committee, Board and General Meetings including Agenda notes for such meetings	Past 8 Years	C.S.
10	Attendance Register(s)/ Slips	Past 8 Years	C.S.
11	Annual Returns and other Forms filed with ROC/MCA	Past 8 Years	C.S.
12	Register of Debenture holders, if any	8 Years after Redemption	C.S.
13	Index of Debenture holders, if any	8 Years after Redemption	C.S.
14	Agreements with Registrar & Transfer Agent	8 Years after determination.	C.S.
15	Agreements with Depositories	8 Years after determination.	C.S.
16	Filings with Stock Exchanges	5 Years	C.S.
17	Secretarial Audit Reports	Permanent	C.S.

2. Finance and Accounts Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Annual Audited Accounts with Reports of Auditors and Directors thereon including Secretarial Audit Report	Permanent	CFO India Operations
2	Investment in the Capital of the Company including approvals / registrations with RBI	Permanent	C.S.
3	Outbound Investment in Associates/JVs/ Subsidiaries, including approvals / registrations with RBI	Permanent	CFO India Operations
4	Accounting Records including Vouchers, Ledgers, Journals, Bank Statements etc., whether in paper form or electronic mode	Past 8 Years or completion of Assessment under Income Tax, whichever is later.	CFO India Operations
5	Fixed Asset Register including capitalization vouchers/ Bills	Permanent	CFO India Operations
6	Loan Sanction Letters including documents executed thereunder	During the currency and 3 Years post complete satisfaction	C.S.
7	Foreign Inward Remittance Certificates/ BRCs	8 Years	CFO India Operations

3. Direct Tax Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Income Tax PAN / TAN applications and allotment numbers/ cards	Permanent	CFO India Operations
2	Corporate Tax Returns/ TDS Returns including Computation of Income, Tax Audit Reports, Tax Payment Challans and Assessment Orders/ Notices of Demand/ Appeals/ revisions, thereof.	Past 8 Years or completion of Assessment under Income/ Wealth Tax, whichever is later.	CFO India Operations

4. Indirect Tax Records			
Sr. No	Record Type	Preservation Period	Person Responsible
1	Applications and Issue of Registration Certificates for : Excise Duty Sales Tax/ Trade Tax/ VAT Service Tax	Permanent	Head – Indirect Taxation
2	Excise Registers/ Returns and other Records Sales Tax/ Trade Tax/ VAT Registers/ Returns and Records Service Tax Returns	Past 8 Years or completion of Assessment under relevant Tax laws, whichever is later.	Head – Indirect Taxation
3	Tax Payment Challans and Assessment Orders/ Notices of Demand/ revisions thereof.	As per Relevant Tax Laws.	Head – Indirect Taxation

5. Intellectual Property / R&D Records			
Sr. No	Record Type	Record Type	Person Responsible
1	Trade Mark, Brand Name, Logo, Copyright and other IP rights	Permanent	C.F.O.
2	Registration Certificates from Department of Science and Technology/ Income Tax, Renewals	Permanent	Head R&D
3	Applications and Grant of Patents	Permanent	Head R&D
4.	Non-Disclosure Agreements with Vendors	During the Currency and 3 years thereafter	Officers concerned
5.	MOUs with Consultants / Technology Providers	During the Currency of agreement and 3 years thereafter	Head R & D

6. Immovable Property Records			
Sr. No	Record Type	Preservation Period	Person Responsible
1	Original Property Title Search Reports wherever applicable, Original Property Purchase and Sale Agreements/ Lease Deeds including Lease Payment Charges/ Land Use Change Certificate/ Mutation Records/ Property Card/ Share Certificate in case of Co-op Societies, Building Plans approval / Occupancy Certificates	Permanent during the ownership of property and copies thereof for 3 years from the sale/ disposal.	Person nominated by CEO unless Original Title Deeds are deposited as Security with Lenders
2	Rent Agreements in respect of property taken on Rent or given on Rent	During the currency of agreement and 3 years from the expiry of tenancy.	Person nominated by CEO

7. Insurance Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Insurance Policies concerning Immovable Property.	5 Years	C.F.O.
2	Insurance Policies concerning business e.g. Assets, Industrial All Risks Policy, Marine Liability, Credit, Directors and Officers Liability, Others – Cash.	5 Years	C.F.O.
3	Group Insurance Plans – Mediclaime Personnel Accident Insurance Group Term Plan	3 Years	Head - Admin

8. Project Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Project Documents and Related correspondence (including any proposal of the Project and its approval)	3 Years from the date of completion of the project	Project Head
2.	Import Licences/ Advance Licences	3 Years from the utilization of Licence/ fulfillment of export obligations, whichever is later.	Officer in charge

9. HR & Personnel Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Employee Personal Files	During currency of employment and thereafter for one year	Head – HR (Corporate)/ respective Units
2	Attendance /Leave Records	3 Years	Head – HR (Corporate)/ respective Units
3	Consultants/ Retainership Agreements	During currency of engagement and thereafter for one year	Head – HR (Corporate)/ respective Units
4	Payroll/ Salary Related Records	8 Years	Head – HR (Corporate)/ respective Units
5	Agreements with Workers/ Staff Union	8 Years	Head – HR (Corporate)/ respective Units
6	Payment of Bonus/ retiral benefits	8 Years	Head – HR (Corporate)/ respective Units
7	Contract Labour Agreements / Records	8 Years	Head – HR (Corporate)/ respective Units
8	Policies for Employees/ Officers	Permanent	Head – HR (Corporate)/ respective Units
9	Gratuity and Superannuation Scheme	Permanent	Head – HR/ C.S.

10. Administration Department Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Registration Papers concerning – Provident Fund, ESIC, Shops & Establishment	Permanent	Head of Department at respective locations
2	Membership, Nomination Forms, under above legislations	During the currency of employment and 8 years thereafter.	Head of Department at respective locations
3	Returns, Challans, Inspection Records etc. under above legislations	8 years.	Head of Department at respective locations
4	Annual Maintenance Contracts	During the currency of property/ equipment concerned and 1 Year thereafter	Head of Department at respective locations

11. Purchase Department Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Agreements with Vendors	During the currency and 3 years thereafter	Head - Purchase
2	Import Licences/ Advance Licences	Till Licence is utilized / transferred / cancelled and 3 years thereafter.	Officer in charge

12. Marketing Department Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Agreements with Customers	During the currency and 3 years thereafter	Head - Marketing
2	Agreements with Transporters	During the currency and 3 years thereafter	Officer in charge
3	Purchase Orders received	8 Years	Officer in charge

13. Documents at Plants			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Industrial Licence(s) / Manufacturing Capacity Registration applications/ certificates	Permanent	Person in charge of the subject/ 'Occupier'
2	Registration Certificates under Factories Act	Permanent	Person in charge of the subject/ 'Occupier'
3	Records & Registers under Factories Act	Permanent	Person in charge of the subject/ 'Occupier'
4	Approval of Building Plans	Permanent	Person in charge of the subject/ 'Occupier'
5	Permissions/ Consent to operate under Pollution Control Acts	Permanent	Person in charge of the subject/ 'Occupier'
6	Permissions/ Licences under Petroleum Act /Explosives Act	Permanent	Person in charge of the subject/ 'Occupier'
7	Approvals / Certifications under The Legal Metrology Act	5 Years	Person in charge of the subject/ 'Occupier'

14. Litigation Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Show Cause Notices and Replies; Litigation/ Court Case Files	3 Years from the close of Litigation	Persons in charge of the subject
2	Court Orders/ Judgments	Permanent	Persons in charge of the subject

15. Correspondence & Internal Memoranda

Sr. No.	Record Type	Preservation Period	Person Responsible
1	Those pertaining to non-routine matters or having significant lasting consequences	8 Years	All concerned
2	<p>Correspondence and Memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g.</p> <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 cycle of correspondence;• Letter of compliant requesting specific actions that have no further value after change of name or address;• Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.	3 Years after close of the matter.	All concerned

16. Electronic Records			
Sr. No.	Record Type	Preservation Period	Person Responsible
1	Electronic Mails All e-mails sent/ received from Internal and External Sources	Mails may be deleted after three years, depending on the importance or lack of it.	All concerned
2	Employees will strive to keep their e-mails related to official issues. Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources. All emails of employees which are important should be copied to employees' folder.		
3	Text / formatted files : All word /excel / Power point and PDF Files	Files may be deleted after two years, depending on the importance or lack of it.	All concerned.
4	Web Page Files : Internet Cookies All workstations/ laptops Internet Explorer or equivalent should be scheduled to delete internet cookies once a month. The Company does not delete electronic files beyond the date specified in the Policy. It is the responsibility of the employees to adhere to the guidelines in this Policy. Each month /week The Company will run back-up copy of all electronic files including emails on servers. This back up is safeguard to retrieve lost information within one year retrieval period should the documents on network experience problems. The back up copy is considered a safeguard for the record retention system of the Company.		

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Appendix-B

Register for Disposal of Records

Sr. No.	Particulars of Documents destroyed	Date and mode of destruction with the initials of CEO

