

POLICY ON PRESERVATION OF DOCUMENTS/ RECORDS AND ARCHIVAL POLICY ON WEBSITE DISCLOSURES

Under Regulation 9 & 30 (8) of the SEBI (Listing Obligation and Disclosures Requirements) Regulation, 2015

BACKGROUND:

SEBI has vide its notification dated 2nd September, 2015 introduced SEBI (Listing Obligation and Disclosures Requirements) Regulation, 2015 (“Listing Regulations”). With reference to this the Board of Directors of The Baroda Rayon Corporation Limited has adopted the following policy with regard to preservation of documents/ records of the Company. The purpose of this policy is to ensure that the Company retains its official records in complete and accurate manner and in accordance with the requirements of all applicable laws. The Archival policy shall be effective from 1st December, 2015 (“Effective Date”).

POLICY:

“Policy” means this Policy on preservation of documents and official records related to and generated in the course of the Company’s operations and archival policy on website disclosures.

Any disclosure of events or information which has been submitted by the Company to Stock Exchange(s) under regulation 30 of the Listing Regulations will be available on the website of the Company for a period of five years from the date of its disclosure. Disclosed information which was over five year old will be archived from the website of the Company and preserved for a further period of three years.

SCOPE:

This policy is framed as per the requirement of Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”). Regulation 9 requires the Company to frame policy on preservation of documents and Regulation 30(8) requires the Company to frame policy on website disclosures and archival of such disclosures.

The policy is framed for the purpose of systematic identification, categorization, maintenance, retention and destruction of documents received or generated in the course of company’s operations. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

The policy also keeps a check to upload all information on the website of the Company and keep uploaded for a period of five years as per requirement of Act.

CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED:

The Company’s physical and electronic documents shall be classified for the purpose of preservation as follows:

A. Documents whose preservation shall be permanent in nature;

B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions.

The documents as specified in A and B above may be kept in electronic mode also. The list of Documents for the above categories is given in the “**Annexure**” to this Policy.

RESPONSIBILITY FOR PRESERVATION OF DOCUMENTS

All the Employees on the permanent rolls of the Company are responsible for taking into account the potential impact on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

It shall be the duty of the Head of each Department to administer this policy. However, the Chief Financial Officer shall be responsible for ensuring the overall implementation of the policy.

SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS:

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, such employee shall inform the management and any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

STATUTORY REQUIREMENTS:

If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

AMENDMENTS TO THE POLICY:

The Board of Directors shall alter, amend or modify the clauses of this Policy from time to time in line with the requirement of the SEBI Guidelines or any other rules, regulations etc., which may be amended and applicable from time to time.

ANNEXURE

A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

1. Accounting and Finance records including Annual Financial statements and Audit Reports;
2. Investment records;
3. Tax records including annual returns;
4. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks;
5. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records; Registration Certificates with any other Regulatory bodies
6. Memorandum and Articles of Association of the company as may be amended from time to time and all corporate policies framed from time to time.
7. Filings with Registrar of Companies.
8. Any other record as may be decided by any KMP (as per Companies Act 2013) or the Managing Director or the Board of Directors of the Company from time to time;

B. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:

1. All accounting records of the Company;
2. Filings with Stock Exchanges and other statutory authorities;
3. Correspondence and Internal Memoranda;
4. Personal files of individual employees (Payroll Records, Employee deduction authorizations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc);
5. All agreements and Contracts;
6. Legal files and documents;
7. Insurance Records including policies and claims;
8. All e-mail correspondence, internal & external;
9. Any other record as may be decided by the Managing Director or the Board of Directors of the Company from time to time.