

VINYL CHEMICALS (INDIA) LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. PURPOSE:

This policy is framed as per requirement of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. CLASSIFICATION OF DOCUMENTS:

- a) documents whose preservation shall be permanent in nature, shall mean all documents which are statutorily required be retained permanently;
- b) documents with preservation period of not less than 8 years after completion of the relevant transactions including website disclosures covered under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, shall be retained for a period of not less than 8 years from the date of occurrence of the event.

Documents covered under the aforesaid two categories shall be accordingly retained.

3. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS:

The Company Secretary and the Key Managerial Personnel appointed by the Board of Directors 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.

4. AUTHORITY FOR MONITORING THE POLICY:

The Company Secretary shall be responsible for monitoring the Policy. The Company Secretary shall inform the Board of Directors about the monitoring of the Policy.

5. DOCUMENTS IN ELECTRONIC MODE:

The Company may keep documents covered under this policy in electronic mode.

6. DISPOSAL OF DOCUMENTS:

Disposal of documents after said period of 8 years (whose preservation is not permanent in nature) shall be done in the presence of the Company Secretary or any person authorized by the Company Secretary in method prescribed by Board of Directors. Before disposal of the documents, a soft copy thereof shall be kept on record. Documents may be retained for longer duration for audit or litigation purposes.

7. MONITORING AND REVIEW:

This Policy will be regularly monitored and reviewed to ensure that it remains relevant to the Company's business aims and requirements. Compliance with this Policy and associated procedures will be monitored on an ongoing basis through self-assessment procedures and reviews.

8. AMENDMENT:

The Board of Directors and/or the Chairman and Managing Director has the right to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever, subject, however, to the condition that such alterations will be in consonance with the provisions of the applicable Laws.

Annexures 1 and 2 contain list of documents whose preservation shall be permanent in nature and documents with preservation period of 8 years respectively.

ANNEXURE 1

Documents whose preservation shall be permanent in nature

S.No	Nature of Documents
1	Common Seal
2	Minutes Books of Board Meetings, General Meetings and Committee Meetings
3	Statutory Registers
4	License and Permissions
5	Statutory Forms and disclosures except for routine compliance
6	Scrutinizers' Report
7	Register of Members
8	Index of Members

ANNEXURE 2

Documents with preservation period of not less than eight years after completion of relevant transaction

S.No	Nature of Documents
1	Annual Returns
2	Board Agenda and supporting documents
3	Attendance Register
4	Office copies of Notice of General Meeting and related papers
5	Office copies of Notice of Board Meeting/ committee Meeting, Notes on Agenda and other related papers
6	All Notices pertaining to disclosures of interest of Directors
7	Instruments creating a charge or modification
8	Books of accounts, financial statements etc.