

## POLICY ON PRESERVATION OF DOCUMENTS

### **INTRODUCTION:**

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), the Board of Directors (the “Board”) of M/s. Universal Starch Chem Allied Ltd. “the Company” has adopted this Policy at its meeting held on February 12, 2016, for Preservation of Documents, as required under applicable regulations.

In any circumstance, where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

### **OBJECTIVE OF THE POLICY:**

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

- To identify statutory records to be preserved.
- To identify records to be maintained either for a period of eight years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form.
- To decide the procedure to destroy the documents after eight years or other applicable period.
- To help employees understanding their obligations in retaining and preserving the documents and records.

### **DEFINITION:**

In this policy unless the context otherwise requires

- a) “Act” means the Companies Act, 2013 and rules made there under, as amended from time to time.
- b) “SEBI Regulations” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.

- c) "Company" means Universal Starch Chem Allied Ltd.
- d) "Key Managerial Personnel" or "KMP" shall have the same meaning ascribed to it under the Act.
- e) "Board" or "Board of Directors" shall mean the Board of Directors of Universal Starch Chem Allied Ltd., as may be re-constituted from time to time.
- f) "Financial Year" shall have the same meaning ascribed to it under the Act.
- g) "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.
- h) "Policy" or "This Policy" means, "Policy on Preservation of Documents".
- i) "Preservation" means to keep the documents preventing them from being altered, damaged or destroyed.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

**SCOPE:**

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

**RESPONSIBILITY:**

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

**GUIDELINES FOR PRESERVATION PERIOD:**

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, 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.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that need to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;

- c. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure – A**.

#### **PRESERVATION LOCATION:**

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

#### **MODE OF PRESERVATION**

Records/documents may be preserved either physically or in 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.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

#### **DESTRUCTION OF RECORDS**

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed. The concerned officer /departmental head 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 **Annexure A**.

#### **POLICY REVIEW:**

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

#### **AMENDMENT**

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

**ANNEXURE – A**  
Indicative List

**A. PERMANENT PRESERVATION:**

- a. Common Seal,
- b. Minutes books of Board, General Meetings and Committee Meetings,
- c. Statutory Registers,
- d. License and Permissions,
- e. Statutory Forms and disclosures except for routine compliance,
- f. Register of Members - to be maintained by Register and Transfer Agent and
- g. Index of Members - to be maintained by Register and Transfer Agent

**B. TEMPORARY PRESERVATION UP TO 8 YEARS:**

- a. Annual Returns,
- b. Board Agenda and supporting documents,
- c. Attendance Register,
- d. Office copies of Notice of General Meeting and related papers,
- e. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,
- f. Scrutinizers' Report,
- g. All notices pertaining to disclosure of interest of directors,
- h. Instrument creating a charge or modification,
- i. Books of accounts, financial statements etc. and
- j. Register of debenture holders or any other security holders.

**C. OTHERS:**

As per applicable law.