



## Sicagen India Limited

### Policy for Preservation of Documents\*

*(Pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)*

Pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015), the Company has formulated the policy for preservation of documents and in compliance of the said Regulations, the Board of Directors of the Company has approved and adopted this policy.

#### a. Documents to be preserved permanently

The Company shall preserve the following documents permanently:

| Description of the Document  | Remarks  |
|--|--|
| i. Certificate of Incorporation  | Original and Scanned copies  |
| ii. Certificate of Commencement of Business  | Original and Scanned copies  |
| iii. Memorandum & Articles of Association, as amended from time to time  | Printed Copies and/or scanned copies   |
| iv. Minutes of the meetings of the Shareholders, Board and Committees  | Original signed as per the relevant regulations (physical or electronic)   |
| v. Agreements, if any, entered into with the Promoters or between/among the Promoters to which the Company is a Party.   | Original or counter-part or copy as may be available   |
| vi. Licenses/ Registration Certificates issued by various authorities relating to Income Tax, Sales Tax, Customs, Central Excise, Service Tax, Directorate of Industrial Safety, local bodies, Employees Provident Fund, Employees State Insurance, Environment, Safety, | As far as possible originals shall be preserved except where the same is surrendered to the authorities for getting a new certificate or otherwise. In such cases certified copies or photo copies shall be preserved. |
| vii. Accounting and other operating manuals as amended from time to time   | Original or copies   |
| viii. Standard Operating Procedures relating to the various activities of the Company  | Original or copies   |
| ix. Joint Venture Agreements, Technical Knowhow Agreements, manuals, drawings and other related documents  | Original or copies   |
| x. Annual Reports  | Printed or Photo copies (at least one copy) or scanned copy  |
| xi. Annual Returns filed under the Companies Act, 1956/2013  | Original or copies or scanned copy   |
| xii. Building approvals, drawings and related documents  | Original   |

| Description of the Document  | Remarks  |
|--|--|
| xiii. Documents relating to the land owned by the Company  | Original Deeds and Agreements entered into by the Company and original/copies of parent documents as made available to the Company by the Vendor(s) at the time of acquiring the property.<br><br>Where the documents are deposited with any bank or FI or other persons to secure any borrowings or otherwise, photo copies shall be available on file. |
| xiv. Approved Standing Orders, Agreements with Labour Unions   | Original or copies   |
| xv. Agreements which do not specify any validity period and have permanent force                               | Original or copies   |
| xvi. Prospectus, Letters of Offer and other similar documents  | Printed or scanned copies  |
| xvii. Other documents as may be prescribed under any law for the time being force to be preserved permanently. | The relevant statutory requirements to be complied with.   |

**b. Documents to be preserved for not less than 8 (eight) years**

The following documents shall be preserved for a period of not less than eight years.

- i. All books of accounts and related records
- ii. Income Tax Returns, Assessment Orders and other related documents
- iii. Sales Tax Returns, Assessment Orders and other related documents
- iv. Excise Records
- v. Import documents
- vi. Service Tax Records
- vii. Insurance Policies, Claims and related documents
- viii. Payroll Records

**c. Other documents**

- a. All agreements and other contracts (other than those covered under (a) and (b) above) shall be preserved for a minimum period of 3 (three) years from the date of expiry.
- b. Documents not covered under any of the above are to be preserved for a minimum period of five years.

#### d. General

- a. The documents relating to issue of securities, share transfer, transmission, split, consolidation, issue of share certificates and other connected matters will be maintained by the Registrar and Share Transfer Agent in such manner and for the periods specified under the relevant law.
- b. Where any litigation / dispute or any investigation by any regulatory body is pending the relevant documents, irrespective the periods stated above, shall be preserved for at least three years after the final disposal of the litigation or resolution of the dispute or as the regulatory body may direct.
- c. Where the period of preservation is longer under any law for the time being in force, the same shall be followed.
- d. For destruction of documents maintained by the Company, prior approval of the Managing Director shall be obtained in writing and the manner of disposal or destruction shall be specified in such approval.
- e. The Company shall maintain a register containing the particulars of documents destroyed, date & mode of destruction and such entries shall be authenticated by the Company Secretary and the register of destruction of records shall be preserved permanently.
- f. The Head of the concerned Functional Department shall be responsible for preservation of the documents as stated above. Where more than one department is involved, the custody of the original documents, if any shall be decided mutually. In any case, copies of the same shall be maintained by all or as the case may be the other departments.
- g. All the physical records shall be preserved in fire proof safes as far as possible and in a proper manner for easy location and retrieval.
- h. Where documents are maintained in electronic form, sufficient back-ups shall be in place.
- i. In case of documents/information uploaded in the Website of the Company, the same shall be archived after the mandatory period and preserved for further 5 (five) years.
- j. The concerned Head of the Department shall be free to preserve the records for longer period or permanently, if he is of the opinion that it is so warranted.
- k. In case of any issues relating to interpretation of the above policy, the same shall be referred to the COO & Whole Time Director for final decision.



- I. Any change to this Policy can be made by the Board from time to time as may be deemed necessary.

*\*Adopted on 01.02.2016.*