

***POCL***

**PONDY OXIDES AND CHEMICALS  
LIMITED**

**POLICY FOR ARCHIVAL OF DOCUMENTS**

## **1.0 OBJECTIVE**

1.1 The Board of Directors of Pondy Oxides & Chemicals Limited (the “**Company**”) has adopted this policy (the, “**Policy**”) to provide guidelines for archival of records and documents as statutorily required in accordance with, and to comply with the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”).

1.2 This Policy shall be effective from 1<sup>st</sup> December, 2015.

## **2.0 DEFINITIONS**

All the words and expressions used in this Policy, unless defined herein, shall have meaning assigned to them in the Companies Act, 2013, rules made thereunder, Listing Regulations and other applicable statutory enactments (collectively, the “**Statutory Provisions**”), as the case may be, as amended, from time to time.

## **3.0 ARCHIVING OF DOCUMENTS HOSTED ON THE COMPANY'S WEBSITE**

3.1 The events or information of the Company disclosed to the stock exchanges (the “**Disclosed Information**”) where the securities of the Company are listed, shall be disclosed on the website of the Company i.e. [www.pocl.co.in](http://www.pocl.co.in) (the “**Website**”) and shall be hosted on the Website for a minimum period of five (5) years from the date of each such disclosure (“**Mandatory Hosting Period**”).

3.2 Beyond the Mandatory Hosting Period, the Disclosed Information shall be archived for such other additional period as may be required considering the requirement of various statutes, law, regulations etc. and other legal and administrative aspects (the “**Archival Period**”).

3.3 No Disclosed Information shall be deleted or destroyed or purged from the Website or from the archival without the prior written approval of any one of the Key Managerial Personnel of the Company, appointed under the Companies Act, 2013 or of any director in the absence of a Key Managerial Personnel.

## **4.0 DISCLOSURE**

This Policy shall be disclosed on the Website.

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## **5.0 INTERPRETATION**

In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.

In case of any clarification required with respect to this Policy, kindly contact the Company Secretary of the Company.

## **6.0 REVIEW**

This Policy shall be reviewed periodically and may be amended by the Managing Director of the Company, as may be deemed necessary.

## **7.0 ADMINISTRATION**

Approval: Key Managerial Personnel of the Company

Prepared & Reviewed by: Pandy Oxides & Chemicals Limited Secretarial Department

Review Date: Two years from the Effective Date

Reason for issue: For simplification of Retention of Documents

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***POCL***

**PONDY OXIDES AND CHEMICALS  
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**POLICY ON PRESERVATION OF  
DOCUMENTS**

## **1. LEGAL FRAMEWORK**

The Board of Directors of Pondy Oxides & Chemicals Limited (“the Company”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

### **EFFECTIVE DATE**

This Policy is effective December 1, 2015.

## **2. DEFINITIONS**

### **A. “Board of Directors” or “Board”**

**Board of Directors or Board** shall mean the Board of Directors of Pondy Oxides & Chemicals Limited, as constituted from time to time.

### **B. “Company”**

Company shall mean “**Pondy Oxides & Chemicals Limited**”.

### **C. “Documents”**

Documents shall mean all papers, records, files, books, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

### **D. “Listing Regulations”**

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

## **3. OBJECTIVE**

The corporate records are important assets. Corporate records include essentially all records, whether paper or in electronic form. A record may be in the form of a memorandum, an e-mail, a contract or a case study and includes computerized desk calendar, an appointment book or an expense record etc. The law requires the Company to maintain certain types of corporate records either permanently or for a specified period of time.

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The Company, from time to time establishes retention or destruction policies or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property. While minimum retention periods are suggested, the retention of the documents identified in those schedules and of documents not included in the identified categories should be determined by the Head of the Department, primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

Broadly, there are two kinds of Company records- **Temporary and Retained.**

### **TEMPORARY RECORDS**

Temporary records include all business documents that are intended to be superseded by final or permanent records, or which are intended to be used only for a limited period of time, including, but not limited to written memoranda and dictation to be typed in the future, reminders, to-do lists, log sheets, reports, drafts, and interoffice correspondence regarding a client or business transaction. Temporary records can be destroyed or permanently deleted if in electronic form when a project or matter closes or within 1 year from the date of the record, as the case maybe.

### **RETAINED RECORDS**

Retained records include all business documents that are not superseded by modification or addition, including but are not limited to documents given (or sent via electronic form) to any third party not employed by the Company, or to any government agency; final memoranda and reports; correspondence; handwritten telephone memoranda not further transcribed; minutes; specifications; journal entries; cost estimates; etc

### **RECORD RETENTION SCHEDULE**

Each Head of the Department shall identify and at all times maintain a schedule of temporary and retained documents.

- The documents listed under **Annexure 1** of this Policy are of permanent nature and shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.
- The documents to be maintained and preserved for a specified time period after completion of the relevant transactions are listed in **Annexure-2** and shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

#### **4. ROLES & RESPONSIBILITIES**

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

#### **5. GENERAL**

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

#### **6. DESTRUCTION OF DOCUMENTS**

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

#### **7. COMMUNICATION AND DISSEMINATION OF THE POLICY**

For all new Employees, 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 posted on the intranet and the web-site of the Company.

#### **8. AMENDMENTS**

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force. In case of any conflict between the Regulations and this Policy, the provisions of the Act shall prevail.

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**Annexure 1**

**Documents whose preservation shall be permanent in nature**

<b>S. No.</b>	<b>Nature of Document(s)</b>
1	Registration Certificates
2	Licenses & Statutory Approvals
3	Statutory Registers required under applicable laws
4	Audited financial statements
5	Minutes of General Meeting
6	Minutes of Board Meeting
7	Minutes of various Committee Meetings
8	Material Agreements/Contracts
9	Orders issued by Courts/Statutory bodies
10	Investment Documents/proofs including certificates etc.
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.



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**Annexure 2**

**Documents with preservation period of not less than eight years after completion of the relevant transactions**

<b>S. No.</b>	<b>Nature of Document(s)</b>
1	Books of Accounts
2	Annual Return(s)
3	Personnel Documents
4	Insurance Policies/ Claims under various policies
5	Correspondences with Departments/shareholders
6	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.