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POLICY ON PRESERVATION OF DOCUMENTS

1. LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

The Board of Directors of the Company is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

2. PURPOSE AND SCOPE

The policy is intended to define preservation of documents responsibilities and to provide guidance to the executives and staff working in making decisions and undertaking other activities that may have an impact on the operations of the Company.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain 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.

EFFECTIVE DATE

This Policy is effective December 1, 2015.

3. DEFINITIONS

A. “Board of Directors” or “Board”

Board of Directors or Board shall mean the Board of Directors of Insecticides (India) Limited, as constituted from time to time.

B. “Company”

Company shall mean “**Insecticides (India) Limited**”.

C. “Documents”

Documents shall mean all papers, records, files, books, tapes, CDs, 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”).

4. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

A. The documents of a permanent nature (listed in **Annexure 1**) 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.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure-2**) 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.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

5. 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.

6. 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.

7. 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. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at **Appendix B**.

This applies to both Physical and Electronic Documents.

8. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, an intimation of this policy shall be included in the appointment letter by HR Department. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

9. 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.

Annexure 1**Documents whose preservation shall be permanent in nature**

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

Annexure 2

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

S.No	Nature of Document(s)
1	Books of Accounts
2.	Board Agenda and supporting documents
3.	Attendance Register
4.	Copies of Notice of Board Meeting/Annual General Meeting and other related paper
5.	Annual Return(s)
6.	Personnel Documents
7.	Investment Records
8.	Insurance Policies/ Claims under various policies
9.	Correspondences with Departments/shareholders
10.	Non-Statutory Registers/Documents
11.	CDs, DVDs, etc.
12.	All e-mails received from Internal and External Sources may be deleted after 8 years.
13.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

Note:

All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.

The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy. Each month the Company will run backup copy of all Electronic files including email on servers. This backup is safeguard to retrieve lost information within 1 year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.

In certain cases document will be maintained both paper and electronic form.

