Policy for Maintenance and Preservation of Documents

1. LEGAL FRAMEWORK

The Board of Directors (the "Board") of Deepak Fertilisers And Petrochemicals Corporation Limited (the "Company") has adopted the following policy with regard to preservation of Documents. This Policy has been formulated in accordance with the provisions of Regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.

This Policy shall be known as "Policy for Maintenance and Preservation of Documents".

2. **DEFINITIONS**

A. "Board of Directors" or "Board"

Board of Directors or Board shall mean the Board of Directors of Deepak Fertilisers And Petrochemicals Corporation Limited, as constituted from time to time.

B. "Company"

Company shall mean "Deepak Fertilisers And Petrochemicals Corporation Limited".

C. "Documents"

Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, 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. PURPOSE

The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under Regulation 9 of Listing Regulations, 2015.

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.

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.

Annexure – 1 Documents which need to be preserved permanently

Sr. No.	Name of the Document	
1.	Minutes of meetings of Board of Directors, Shareholders and all Committees	
2.	Statutory Registers	
3.	Licenses and Approvals of Statutory Authorities	
4.	All Judgments, Orders delivered by all Courts, Tax Authorities etc.	
5.	Annual Audit Reports and Annual Returns filed with the Ministry of Corporate Affairs (MCA)	
6.	Property Records – Original Purchase / Sale Agreements, Property Card, Index II, Ownership records issued by Government Authorities, Insurance documents for properties	
7.	Any other document which is prescribed by any Enactment for preserving on permanent basis	

Annexure – 2 Documents which need to be preserved for a period mentioned below;

Sr. No.	Name of the Document	Period of preservation
1.	Attendance Registers, Notice, Agenda papers with supporting notes for the meetings of the Board of Directors, Shareholders and all Committees	8 years
2	Register and Index of Debenture holders	15 years from the date of redemption
3	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
4	Bank Statements, Investment Records	8 Years
5	Excise, Income Tax, Services Tax papers	8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.
6	Contracts, Agreements and Related correspondence (including any proposal that of contracts resulted in the contract and other supportive documentation)	8 years after termination or expiration
7	Employee information records	8 years from the date of separation of employee