

PRIMO CHEMICALS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

1. INTRODUCTION

The Companies Act, 2013 with the applicable Rules framed there under deals with the provisions for maintenance of various documents including registers and records by the Companies and also provides for the place for keeping and period for preserving such documents.

Regulation 9 of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 states that every listed entity is required to formulate a policy for preservation of documents, which shall be approved by the Board of Directors of the Company. Such Policy should classify the documents to be preserved into at least two categories as follows:

- (a) documents whose preservation shall be permanent in nature;
- (b) documents whose preservation period shall be not less than eight years after completion of relevant transactions.

2. OBJECTIVE

In view of the above background, the Company is required to formulate a Policy for Preservation of Documents. Therefore, this Policy in the name of "PRIMO Preservation of Documents Policy" is framed and thereby to ensure compliances of the provisions of the Companies Act 2013, the Rules framed there under and the Regulations.

3. APPLICABILITY AND EFFECTIVE DATE

Applicable to the Company with effect from 13.02.2020.

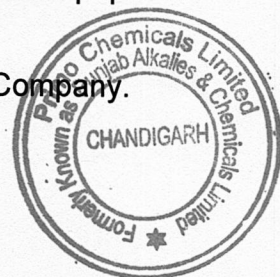
4. DEFINITIONS

"Act" means the Companies Act, 2013 or any previous company law (to the extent the provisions there under are in force) and Rules framed there under, including any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.

"Articles" means the articles of association of a company as originally framed or as altered from time to time or applied in pursuance of the Act.

"Book and Paper" and "book or paper" includes books of account, deeds, vouchers, writings, documents, minutes and registers maintained on paper or in electronic form.

"Board of Director or Board" means Board of Directors of the Company.



“Company” means Primo Chemicals Limited (Primo).

“Document” includes summons, notice, requisition, order, declaration, form and register, records, whether issued, sent or kept in pursuance of this Act or previous company law or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.

“Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and includes any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.

“Rules” means rules framed under the Companies Act, 2013 or any previous Company law (to the extent such rules are in force) including any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.

(Words and expressions used and not defined herein shall have the meanings respectively assigned to them in the respective Acts/ Rules/ Regulations)

5. PRESERVATION OF DOCUMENTS

5.1 As per the Policy, the Company shall maintain and preserve register and records, books and/or paper, books of accounts etc (“Documents”) as follows:

- a) Documents to be preserved permanently;
- b) Documents to be preserved for eight years; and
- c) Documents to be preserved for five years.

a) Documents to be preserved permanently;

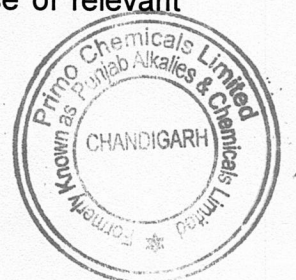
As required under the provisions of the Act / Rules / Regulations, the documents which are required to be preserved on permanent basis shall be maintained and preserved by the Company permanently.

b) Documents to be preserved for eight years

As required under the provisions of the Act / Rules / Regulations, the documents which are required to be preserved for a period of eight years shall be maintained and preserved by the Company accordingly.

c) Documents to be preserved for five years.

In cases of documents for which no period is specified under the Act/ Rules /Regulations, such documents shall be maintained by the Company for a period of five financial years from the close of relevant financial year.



5.2 Documents to be maintained under this Policy shall be preserved in Physical or in Electronic Form/ Mode as per the provisions of the Act / Rules /Regulations. For this purpose, the word “Electronic Mode / Form” shall have same meaning as defined under the Act /Rules, as the case may be.

6. PRESERVATION OF DOCUMENTS BEYOND THE PRESCRIBED PERIOD

Notwithstanding anything contained in the Act / Rules / Regulations, the Registrar of Companies or any other competent authority, may by order in writing, direct the Company to preserve any of the documents under this Policy beyond the prescribed period, for such period as specified in the order.

7. DESTRUCTION OF DOCUMENTS

The documents kept and preserved by the Company under this Policy for the respective periods may be destroyed after the expiration of such period as per the provisions of the Act /Rules /Regulations. In absence of such provisions, such documents shall be destroyed after obtaining approval of the concerned Departmental Heads to which such document(s) relates.

8. REGISTER OF DOCUMENTS DESTROYED

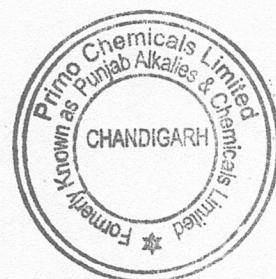
The Company shall maintain a register for documents destroyed as per this Policy. The Register of Documents Destroyed shall contain brief particulars of the documents destroyed, date and mode of destruction.

9. DISCLOSURE

The Company shall disclose this Policy on its website.

10. AMENDMENT IN LAW

Any subsequent amendment / modification in the Act /Rules /Regulations in this regard shall automatically apply to this Policy. While approving this Policy the Board of Directors has authorized the Managing Director of the Company to further modify or amend the Policy from time to time in view of the amendments / modifications or re-enactment in the Act /Rules /Regulations and such amendments /modifications etc. shall automatically form part of this Policy and shall have same force and effect as if approved by the Board of Directors of the Company.



“Primo Archival Policy” on disclosures hosted on the website of the Company

1. Purpose and Scope:-

In pursuance of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, listed entity is required to disclose on its website all such events or information which has been disclosed to stock exchanges where the securities of the Company are listed under Regulation 30 of Listing Regulations. Further, such disclosures shall be hosted on the website of the Company for a minimum period of 5 years and thereafter as per the archival policy of the Company, as disclosed on its website.

Accordingly, the Company has adopted this "Archival Policy" on disclosures to be hosted from time to time on the website of the Company".

2. Documents to be Hosted on Website:-

The Company shall host on its website, information and documents which are required to be hosted as per the Companies Act, 2013 and Rules framed there under, SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 and other applicable laws, Rules and Regulations.

3. Period of Hosting the Events or Information:-

The disclosures made by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations, shall be hosted on the website of the Company namely www.primochemical.in for a minimum period of 5 years. In case the aforesaid disclosures are required by any applicable law or regulation to be hosted for a period longer than that mentioned above, such disclosures shall be hosted on the website of the Company for such longer period.

4. Archival of Documents:-

After the hosting period as stated above is over, thereafter, the information/ documents may be deleted removed from the website after obtaining approval from the Chief Financial Officer or the Company Secretary.

5. Amendment:-

The Policy can be amended, modified or revised by the Chief Financial Officer and the Company Secretary of the Company from time to time. In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed there under and Listing Regulations, the Statutory Provisions shall prevail.

