



ARCHIVAL POLICY

1. BACKGROUND

Regulation 30(8) of the SEBI Listing Regulations requires every listed entity to make available an archival policy on its website. In this context, the following policy has been framed by the Board of Directors of the Company.

2. OBJECTIVES

Pursuant to Regulation 30(8) of the SEBI Listing Regulations, records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual, legal or regulatory requirements or for other purposes as may be set forth below. Records that are no longer required, or have satisfied their required periods of retention, shall be destroyed as per the procedure prescribed under law.

3. SCOPE

In line with the Company's Policy on Determination of Materiality of Events and as per the SEBI Listing Regulations, the Company shall disclose all such events to the Stock Exchanges and such disclosures shall be hosted on the website of the Company for a period of 5 years and thereafter the same shall be archived so as to be available for retrieval for a further period of three years by storing the same on suitable media. Thereafter the said information, documents, records may be destroyed as per the policy on preservation of documents.

4. POLICY REVIEW

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for approval and noting at a meeting of the Board.

COMPLIANCE AND VIOLATION

FAILURE TO COMPLY WITH THIS DOCUMENT RETENTION AND ARCHIVAL POLICY MAY RESULT IN DISCIPLINARY ACTION.



ANNEXURE – 1

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE IN THE ARCHIVES OF THE COMPANY

I. Corporate Records

1. Common Seal
2. Registration Certificate
3. Constitutional documents i.e. Memorandum and Articles of Association of the Company
4. Affidavit from the subscribers to the memorandum and from person named as the first directors
5. Minutes Books of Board, General Meetings and Committees Meetings
6. Statutory Registers
7. License and Permissions
8. Statutory Forms except for routine compliance
9. Scrutinizers Report
10. Register of Member
11. Index of Members
12. Audited Financial Statements
13. Documents related to purchase of shares/investments in an entity
14. Books and documents relating to issue of share certificate, including blank forms of share certificates



Samrat Pharmachem Limited

Manufacturers & Exporters of Pharmaceutical Chemicals

II. Accounts and Finance

1. Annual Audit Reports and Financial Statements
2. Subsidiary's Account
3. Internal/Cost audit Reports
4. Compliance/Secretarial Audit Report

III. Tax Records

1. Tax Exemption and Related documents
2. Tax Bills, receipts and payments

IV. Legal Files and Records

1. Court Orders
2. Business / JV/SPA/Loan/Lease Agreements
3. Trade Mark /Copy Rights/Patents

V. Property Records

1. Original Purchase and Sale Agreement
2. Property Card, Index II, Ownership records issued by Government Authority
3. Property Insurance

VI. Projects

1. Project Documents and Related correspondence (including any proposal of the Project and its approval)
2. The documents containing the terms and conditions regarding operation and management of manufacturing units



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VII. Correspondence and Internal Memo

Those pertaining to non-routine matters or having significant lasting consequences

VIII. Insurance Records

All Insurance Policies

IX. Personnel Records

1. Payroll Registers
2. Bonus, Gratuity and other Statutory Records

X. Agreement

Material Agreements/Contracts



ANNEXURE – 2

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN THREE YEARS, EIGHT YEARS OR MORE AFTER COMPLETION OF RELEVANT TRANSACTION AND MISCELLANEOUS

I. Corporate Records

1. Annual Returns and other Forms filed with MCA
2. Board Agenda and supporting documents
3. Attendance Register
4. Office copies of Notice of General Meeting and related papers
5. Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers
6. All notices pertaining to disclosure of interest of directors
7. Films, Audio, Video, CDs, DVDs, etc
8. Correspondence with Department/Shareholders
9. Certificates surrendered to a Company
10. Instrument creating a charge or modification
11. Any other documents which have been so decided to be preserved by the Function/Department Heads, either under their own respective judgments or as required to be preserved by any specific Law
12. Miscellaneous – Register of Debenture-holders, if any (15 years after the redemption of debentures)
13. Miscellaneous – Index of debenture-holders, if any (15 years after the redemption of debentures)



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II. Accounts and Finance

1. Annual Plans and Budgets
2. Books of Accounts, Ledgers and Vouchers
3. Sales Invoice & Purchase Invoice
4. Bank Statements
5. Investment Records
6. RBI Returns
7. Foreign Trade documents
8. Miscellaneous – General Correspondence (3 Years)

III. Tax Records

1. Excise/Customs Records
2. Tax Deducted at Source Records
3. Income Tax papers
4. Service Tax papers
5. VAT / CST / State Sales Tax
6. Above records needs to be maintained from 8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.

IV. Legal Files and Records

1. Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)



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2. Miscellaneous – Legal Memoranda and Opinions including subject matter files (3 years after the close of the matter)
3. Miscellaneous – Litigation files

V. Correspondence and Internal Memo

1. Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g.
 - Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings;
 - Letters of general enquiry and replies that complete the cycle of correspondence; (3 Years)

VI. Insurance Records

1. Journal Entry support data
2. Inspection Reports
3. Miscellaneous
4. Claims records (Till settlement is over and claim money is received)
5. Group Insurance Plans (Until plan is amended or Terminated)

VII. Personnel Records

1. Time office Records and Leave Cards
2. Unclaimed Wages Records
3. Employees Information Records
4. Statutory Returns /Reports
5. Miscellaneous – Employees Medical Record (3 years after separation)



VIII. Electronic Records

1. *Electronic Mail*

All e-mails received from Internal and External Sources may be deleted after 5 years.

- Employees will strive to keep their e-mails related to business issues.
- All Emails related to business issues should be downloaded to a server or user directory on server.
- Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.
- All e-mails of Employees which are important should be copied to the employees' folder.

2. *Web Page Files : Internet cookies*

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.