HALDIA PETROCHEMICALS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

(Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

1. SCOPE

This policy for preservation of Documents (hereinafter referred to as 'the policy') is framed in accordance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulations, 2015 (hereinafter referred to as 'Regulations').

The policy sets the standards for systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business.

2. OBJECTIVE

The Objective of this Policy is to integrate, harmonise and standardise the procedure and manner for preservation and destruction of documents which are required to be prepared or maintained under the SEBI laws and the Act.

This Policy contains guidelines to identify documents that are required to be maintained and the period for which those documents should be retained.

3. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED/ RETAINED

The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:

a. Documents whose preservation shall be permanent in nature.
b. Other documents whose preservation period shall not be less than eight years after completion of the relevant financial year of transactions.

An indicative list of documents for the above categories are given in the **Annexure-I.**

4. Archival Policy

The policy applies to documents/ information hosted on the website of the company including events/information required to be disclosed on website under SEBI Regulations.

The disclosure of material /events shall be hosted and retained on the Company's website for a minimum period of 5 (five) years. Thereafter depending upon the nature, materiality, impact and relevance of the material/ event/ information, the disclosure of such material/ event can :

a. continue to remain hosted on the Company's website for a longer period of time on the advice of concerned functional head to Corporate Communication.

b. can be removed from the website or

c. can be archived by appropriate technology.

5. PRINCIPLE RESPONSIBILITY

The employees of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and the decision to retain/preserve or destroy documents pertaining to their area shall be taken by the respective department head in co-ordination with the Authorized Person.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

In case of preservation of electronic records, an important factor to be considered is the inevitability of hardware, software and media obsolescence. These records must either be migrated to new versions or the old hardware and software must be retained in order to read the records. Good quality control measures must be in place when migrating to ensure all information retains its original content, context and structure.

6. DESTRUCTION OF DOCUMENTS

The destruction of any documents shall be reviewed by the respective department and prior approval from the Board of Directors/any Committee and/or the authorized person delegated and authorized, by the Board shall be obtained for this purpose. Details of all documents destroyed shall be entered in the register maintained for this purpose with the Authorized Person. The format of the register has to be in accordance with **Annexure-II.**

Premature destruction of records is expressly prohibited, and if intentional, may result in disciplinary action, up to and including termination of employment and possible civil or criminal liability.

Documents/Records in respect of which any investigation/enquiry is pending or in respect of which any legal proceeding is pending or which is part of any legal dispute are not covered under this policy and the same need to be controlled/maintained/preserved pursuant to the respective requirement.

7. AMENDMENTS

The Board of Directors is authorized to make alterations to this policy as considered appropriate from time to time, however such alterations shall not be inconsistent with the provisions of Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulations, 2015.

If subsequent to amendment in the laws, this Policy or any part hereof becomes inconsistent with the law, the provisions of law shall prevail and this Policy shall be deemed to be amended to that extent.

Place: Kolkata
Date: 11.11.2022

By order of the Board of Directors
Sd/-
Company Secretary

ANNEXURE - I

Permanent Preservation

1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited Financial Statements
5.	Audit Reports
6.	Investment records
7.	Tax records
8.	Property records including purchase and sale deeds, licenses, copyrights, patents & trademarks
9.	Minutes Book of Board and all committees
10.	Minutes Book of General Meeting
11.	Annual Return
12.	Material Agreements/Contracts
13.	Orders Issued by Court / Statutory Bodies
14.	Personal files of individual employees
15.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

* In case of Merger or Amalgamation, minutes of all meetings of the Transferor Company shall be handed over to the Company.

Documents whose preservation period is atleast eight years after the completion of the relevant transaction/period:

1.	Books of accounts together with relevant vouchers
2.	Insurance Polices/ Claims
3.	Payroll records
4.	CSR records
5.	Tender documents

6.	Correspondence with departments/ shareholders
7.	Office copies of Notices, Agenda, Notes on Agenda and other related papers of Board and its Committee meetings.
8.	Office copies of Notices, Scrutinizers Report and related papers of General Meeting and Postal Ballot.
9.	Attendance Registers for meeting of the Board and its committees.
10.	Disclosure of interest by Directors
11.	Instrument creating a charge or modification
12.	Documents submitted or disclosures made to the stock exchanges.
13.	Documents filed with Registrar of Companies (other than the documents which are required to be maintained permanently)

ANNEXURE - II

Register of documents disposed/destroyed

Particulars of Documents disposed along with the applicable provisions	Date of Destruction	Mode of Destruction	Signature of Authorised Person