

POLICY FOR PERSERVATION AND ARCHIVAL OF DOCUMENTS

1. OBJECTIVE

The Policy is framed in accordance with the requirements of the Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations).

The Policy is to maintain complete, accurate and high quality records. Records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual, legal or regulatory requirements or for other purposes as may be set forth below.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.

No officer, director, employee, contractor or volunteer of Heubach Colorants India Limited(HCIL) shall knowingly destroy a document with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case.

The Board of Directors of HCIL reserves the right to amend and alter this policy at any time.

2. EFFECTIVE DATE

This Policy is effective December 1, 2015.

3. DEFINITION

“**Act**” shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“**Board of Directors**” or “**Board**” means the Board of Directors of Heubach Colorants India Limited, as constituted from time to time.

“**Company**” means Heubach Colorants India Limited.

“**Key Managerial Personnel**” mean key managerial personnel as defined in sub-section (51) of section 2 of the Companies Act, 2013;

“**Listing agreement**” shall mean an agreement that is to be entered into between a recognised stock exchange and the Company pursuant to Securities and Exchange Board (Listing Obligations and Disclosure Requirements), 2015

“**Policy**” means this Policy for Preservation and Archival of Documents.

“**Regulations**” mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Listing Agreement, Regulations or any other applicable law or regulation to the extent applicable to the Company.

4. APPLICABILITY

This policy shall apply to all the registers, records, documents that are required to be maintained and preserved under the applicable provisions of the Act, Regulations or any other law, to the extent applicable to the Company, for the time being in force.

5. STATEMENT OF POLICY

Documents 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 decided by the Board. The Company shall preserve the documents either in physical form or in electronic form, as may be permitted by law, as mentioned below.

- a. All the registers, records, documents that are required to be maintained and preserved under the applicable provisions of the Act, Regulations or any other law for the time being in force shall be maintained for a period of 8 years or such other period as may be mentioned in the relevant applicable law, whichever is longer.
- b. All the documents, records that are required, under the applicable provisions of the Act, Regulations or any other law for the time being in force, to be hosted on the website of the Company shall be hosted on the website of the Company for a minimum period of five (5) years or such other period as may be mentioned in the relevant applicable law, whichever is longer.

6. DISPOSAL OR DISTRUCTION OF THE DOCUMENTS

All the registers, records, documents, covered under this policy, may be destroyed after the expiration of the applicable preservation period and the Company shall maintain a register entering the details of destroyed documents and the entries made therein shall be authenticated by the Secretary or any other person as may be authorized by the Board for this purpose. The list of registers, records, documents destroyed, in accordance with this policy, shall be placed before the Board, within 4 months of such destroyal, for its information. Any disposal of registers, records, documents, which is not in accordance with this policy, shall be subject to prior approval of the Board.

7. 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 the Policy entirely with a new Policy.