

Title: APAR Policy on Preservation of Documents
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APAR INDUSTRIES LIMITED
(CIN : L91110GJ1989PLC012802)

Policy on Preservation of Documents

1. Preface :

The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every Listed Company to frame a Policy on Preservation of Documents under Regulation 9 in Chapter III. In terms of the said requirement, the Company – APAR Industries Limited formulates the Policy on Preservation of Documents on the following lines.

2. Scope :

The law requires the Company to maintain certain types of corporate records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject you and the Company to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

3. Applicability and its Effective Date:

The policy applies to all the employees of the Company and become effective as on December 01, 2015.

4. Categories of Documents covered by this Policy:

A. Documents whose preservation shall be permanent in nature:

The following documents shall be preserved permanently:

- (I) Minutes Book of Meetings of –
 - Board of Directors
 - All Committees of the Board
 - Shareholders / Class of Shareholders
 - Debenture holders
 - Creditors
- (II) All the Secretarial Records
- (III) Employment Records / Personal Records of all existing employees and past employees for a period of eight years after they cease to be in employment.

(IV) Papers relating to legal matters / litigation.

For cases/matters/plaints when disposed off by the Hon'ble Courts/Tribunals, then only Final Orders/Judgements be preserved.

B. Documents with preservation period of not less than eight years after the completion of the relevant transactions:

(I) Books of Accounts

(II) Tax Records

5. Mode of Preservation:

The documents may be preserved in Physical Form or in Electronic Form. The retention period of preservation of documents shall remain the same, irrespective of maintenance of documents in physical or electronic format or both.

6. Authority to implement the Policy and decide the period of preservation and kinds of documents to be preserved:

The Chief Financial Officer is authorized to implement the Policy and add to the list of documents to be preserved permanently or for the period of eight years as the case may be.

7. Responsibility of Employees for Custody and Preservation of Documents:

All the employees are responsible for taking into account the custody and potential impact on preservation of the documents in their area of work / assignments and their decision to retain/preserve or destroy documents pertaining to their area.

All are requested to note and follow the aforesaid Policy in letter and spirit.

Kushal N Desai

Chairman & Managing Director