

Policy on Preservation of Documents

I. 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.

II. 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.

III. Applicability and its Effective Date:

This policy applies to all the employees of the Company and becomes effective as on **December 01, 2015**.

IV. Categories of Documents covered by this Policy :

A. Documents whose preservation shall be permanent in nature :

The following documents shall be preserved permanently :

1. Minutes Book of Meetings of –
 - Board of Directors
 - All Committees of the Board
 - Shareholders / Class of Shareholders
 - Debentureholders
 - Creditors
2. All the Secretarial Records.
3. Employment Records / Personal Records of all existing employees and past employees for a period of eight years after they cease to be in employment.
4. Papers relating to legal matters / litigation.

For cases / matters / complaints 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.

1. Books of Accounts
2. Tax Records.

V. Authority to decide the period of preservation and kinds of documents to be preserved :

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

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