

NCL/COSEC/C/1/21092018



**NEOGEN**  
CHEMICALS LTD.

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## POLICY ON PRESERVATION OF DOCUMENTS & ARCHIVAL OF RECORDS

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Effective from: 21-09-2018

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## **1. Background**

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations') and the Companies Act, 2013 ('2013 Act'). Archival Policy as referred to in Regulation 30(8) of the Listing Regulations forms part of this Policy. This Policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of 2013 Act.

## **2. Objective**

The objective of this Policy is to lay down the principles for the preservation of documents and records of the Company. In the event of any inconsistency between this Policy and the Listing Regulations, the Listing Regulations as amended from time to time, will prevail over this Policy.

## **3. Regulatory Framework**

I. Regulation 9 of the Listing Regulations requires listed entities to have a Policy on Preservation of documents approved by its Board of Directors, classifying the documents in at-least 2 categories as follows:

- a. Documents whose preservation shall be permanent in nature; and
- b. Documents with preservation period of not less than 8 years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

II. Regulation 30(8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of 5 years and thereafter as per the archival policy of the company, as disclosed on its website.

III. As per applicable provisions of 2013 Act certain documents are required to be preserved permanently or up to a certain prescribed time.

## **4. Definitions**

I. **"Archival"** means accumulation/storage of historical records on server/network or at a physical place.

II. **"Company"** or **"the Company"** shall mean Neogen Chemicals Limited.

III. **"Documents"** or **"Records"** mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company.

IV. **“Preservation”** or **“preserve”** means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.

V. **“Policy”** or **“this Policy”** shall mean the Policy on Preservation & Archival of documents and records.

## **5. Policy on Preservation of documents:**

I. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards and the Listing Regulations and any other applicable law, rule, regulation or internal policy of the Company, in force.

II. Subject to (I) above, certain documents and records (as specified by the applicable law / regulation) shall be preserved for not less than 8 years after completion of the relevant transaction.

III. Other documents and records (as specified by the applicable law / rule / regulation) shall be preserved either: -

- Permanently, or
- For such other period as may be prescribed under the applicable law/ rule/ regulation for the time being in force and thereafter the records can be destroyed.

## **6. Archival Policy:**

The Company shall disclose on its website all such information as prescribed by the Companies Act, 2013, Listing Regulations and any other applicable law. The Company shall also disclose on its website all such events or information which has been disclosed to stock exchange(s) under Regulation 30(8) of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a minimum period of 5 years and thereafter the same shall be archived.

I. The document and records which are no longer current, but which are required to be preserved for a specified period of time or permanently under the applicable laws/ rules/ regulations shall be archived by the Company.

II. The documents and records may be archived in physical and/or electronic mode as the Board of Directors of the Company may deem fit.

III. The documents and records archived in electronic form shall be backed up automatically on a periodic basis.

IV. Documents and records which are no longer required to be preserved as per the provisions of this Policy may be destroyed in such manner as prescribed by the Company's Board of Directors.

## **7. Amendments**

The Board may, subject to the applicable laws amend any provision(s) or substitute any of the provision(s) of this Policy with new provision(s) or replace this Policy in entirety.

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