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## PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

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Policy Change log			
Version	Issued on	Effective from	Purpose of change
v1	September 18, 2025	September 18, 2025	New Policy release

**PARIJAT INDUSTRIES (INDIA) LIMITED**

*(Formerly Known as Parijat Industries (India) Private Limited)*

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## 1. Preamble

Parijat Industries (India) Limited (“**Company**”) has established this Document Preservation and Archival Policy (the “**Policy**”) in line with Regulation 9 and Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time (the “**SEBI Listing Regulations**”) and relevant sections of the Companies Act, 2013. Its purpose is to define how documents are identified, stored, retained, and responsibly disposed of, ensuring compliance with statutory requirements while maintaining efficient record-keeping practices.

The board of directors of the Company have adopted the Policy at their meeting held on September 18, 2025, and relevant provisions of SEBI Listing Regulations shall be effective from the date of listing of the Company .

## 2. Objective

The purpose of the policy is to facilitate the following:

- i. Determination of the period for preservation of record/ documents of the Company based on their reference value and statutory requirements. Following aspects have to be considered in determination of such period:
  - a. Company’s own information retrieval needs;
  - b. Statutory requirements under respective statutes;
  - c. Litigation requirements;
  - d. Ease of retrieval;
  - e. Optimal use of storage space and cost of preservation; and
  - f. Timely sanitation of obsolete records.
- ii. Identification of records that are to be maintained permanently or for any other shorter period of time.
- iii. Deciding the mode of preservation of documents, whether in physical form or in electronic form.
- iv. Retention of records for the periods required by applicable laws and regulations and for other business reasons for a period of time that will reasonably assure their availability when needed.
- v. Preservation of the confidentiality and security of records.
- vi. Systematic and non-selective disposition of records not necessary for legal or business reasons.

## 3. Scope and Applicability

This Policy applies to all records held by the Company, whether in paper or electronic media, including documents required under the Companies Act, 2013, SEBI Listing Regulations, or other applicable laws.

## 4. Preservation of Documents

The Company is required to maintain certain types of corporate records for a specified period of time under applicable corporate/ securities laws, including but not limited to the SEBI Listing Regulations and the Companies Act, 2013 (“**Applicable Laws**”). There are certain types of records that need to be retained for a specified period of time, as identified below as per Regulation 9 of the SEBI Listing Regulations:



- a) **Documents to be preserved permanently:** The documents listed in Schedule I along with any other documents required legally shall be maintained and preserved permanently by the Company.
- b) **Documents to be preserved for no less than eight (8) years and prescribed period:** The documents listed in Schedule II along with any other documents required legally shall be maintained and preserved for no less than eight (8) years or prescribed period by the Company.
- c) **Documents to be preserved for five (5) years:** In cases of documents for which no period is specified under the Act/ Rules/ Regulations, such documents shall be maintained by the Company for a period of five financial years from the close of the relevant financial year. Approval of the Board of Directors of the Company (“Board”) or committee thereof shall be taken before destruction of such documents.
- d) **Documents to be preserved for no less than three (3) years:** All communications to the Board, committees of the Board and members with regard to calling of meetings.
- e) **Documents disseminated on website:** All such events or information which has been disclosed to stock exchange(s) under regulation 30 of SEBI Listing Regulations, such disclosures shall be hosted on the website of the listed entity for a minimum period of five (5) years

Provided that these records may be preserved for longer periods of time where required under any other Applicable Laws. Similarly, if an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise.

## 5. Modes of Preservation

The Company shall maintain these records, as per the prescribed formats, either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company. The preserved records must be accessible at all reasonable times. Access may be controlled by the heads of the respective business divisions/ departments with preservation, so as to ensure integrity of the records and prohibit unauthorised access.

The heads of respective departments of the Company shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under their charge of each of them.

## 6. Destruction of documents

Unless required to be preserved for a particular purpose like litigation or regulatory directive and upon expiration of the specified period of time for preservation as per applicable laws Companies Act and SEBI Listing Regulations, the document may be destroyed by the Company after approval of the Board and/ or functional/ departmental heads and in the presence of the Company Secretary and/or the Chief Financial Officer (“CFO”). The Board shall review, at least once in every three years, the list of documents that may be destroyed. The Company shall maintain a register of records and documents destroyed, containing the particulars of the documents destroyed, the year to which it pertains, mode of destruction etc., each entry in this register shall be verified by the Company Secretary and countersigned by the CFO. Any deviation will be approved by any of the Executive Directors jointly or severally.

The concerned employee shall be responsible for taking into account the potential impact on the preservation/destruction of the documents in their work area and their decision to retain/preserve/destroy documents pertaining to their area of work. The modes of destruction of records can include methods like shredding, recycling, deleting or destroying electronically stored data etc. or any other mode as permissible by law.



## **7. Policy Review and Amendment**

. The Committee and the Board shall review this Policy periodically and make revisions, if necessary. In the event of any inconsistency between this Policy and applicable laws, the latter shall take precedence. Any changes in regulatory requirements shall automatically be deemed part of this Policy without requiring formal Board approval.

## **8. Disclosures**

This Policy shall be published on the Company's website.

## **9. Effective Date**

This Policy shall come into effect upon its approval by the Board and shall continue to remain in force until amended or rescinded.



### Schedule I

S.No.	Section/Rules/Clause OF Companies Act, 2013	Type of Document
1.	-	Documents and information filed with Registrar of Companies for incorporation of the Company
2.	-	Certificate of incorporation and certificate of change of name, if any
3.	Section 7(4)	Memorandum of Association and Articles of Association as amended from time to time
4.	Section 7(4)	Declaration in the prescribed form by an advocate, a chartered accountant, cost accountant or company secretary in practice, who is engaged in the formation of the company, and by a person named in the articles as a director, manager or secretary of the company, that all the requirements of the Companies Act, and the rules made thereunder in respect of registration and matters precedent or incidental thereto have been complied with.
5.	Section 7(4)	A declaration from each of the subscribers to the memorandum and from persons named as the first directors, if any, in the articles that he is not convicted of any offence in connection with the promotion, formation or management of any company, or that he has not been found guilty of any fraud or misfeasance or of any breach of duty to any company under the Companies Act or any previous company law during the preceding five years and that all the documents filed with the registrar for registration of the company contain information that is correct and complete and true to the best of his knowledge and belief.
6.	Section 7(4)	The address for correspondence till the registered office is established.
7.	Section 7(4)	The particulars of name, including surname or family name, residential address, nationality and such other particulars of every subscriber to the memorandum along with proof of identity, as may be prescribed.
8.	Section 7(4)	The particulars of the persons mentioned in the articles as the first directors of the Company, their names, including surnames or family names, the director identification number, residential address, nationality and such other particulars including proof of identity as may be prescribed.
9.	Section 7(4)	The particulars of the interests of the persons mentioned in the articles as the first directors of the Company in other firms or bodies corporate along with their consent to act as directors of the Company in such form and manner as may be prescribed.



10.	-	Agreements made by the Company with the Stock Exchanges and Depositories, etc.
11.	Rule 25(1)(f) of the Companies (Management and Administration) Rules, 2014 and Clause 8.1 of Secretarial Standard 1	Minutes of Board or Committee Meetings including Minutes of all Meetings of the transferor Company under a scheme of arrangement.
12.	Rule 25(1)(e) of the Companies (Management and Administration) Rules, 2014 and Clause 18.1 of Secretarial Standard 2	Minutes of General Meeting including Minutes of all Meetings of the transferor Company under a scheme of arrangement.
13.	Regulatory / business licenses, approvals, permits, etc.	Licenses, Certificate, and permissions obtained from any statutory authority.
14.	Any other material document(s), agreements, contracts, order issued by court or statutory bodies as may be required to maintain permanently by any laws / requirements of the Company	Order from Courts and any other regulatory authorities, intellectual property documents.
15.	Section 186(9) and Rule 12(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of loans, guarantee, security and acquisition of securities made by the Company in form MBP 2.
16.	Section 187(3) and Rule 14(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of investments not held in its own name by the Company in form MBP 3.
17.	Section 189(1) and Rule 16(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of contracts or arrangements in which directors are interested in form MBP 4.
12.	Section 189(1) and Rule 16(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of charges



13.	Section 88 and Rule 15(1) of the Companies (Management and Administration) Rules, 2014	Register of Members along with index of the names
14.	Section 88 and Rule 15(4) of the Companies (Management and Administration) Rules, 2014	Foreign register of members
15.	Section 88 and Rule 15(4) of the Companies (Management and Administration) Rules, 2014	Register of Renewed and Duplicate Share Certificates



## Schedule II

Sl. No.	Document	Period
1.	Instrument creating charge or modification thereon	8 years from the date of satisfaction of charge by the company
2.	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto	8 years from the date of filing with the Registrar of Companies.
3.	All notices in Form MBP-1 for disclosure of concern/ interest received u/s 184 of the Companies Act, 2013 and Rule 9(1) the Companies (Meetings of Board and its Powers) Rules, 2014	8 years from the end of the financial year to which it relates
4.	The attendance register of Board & Committee Meetings	8 financial years from the date of last entry made therein and may be destroyed thereafter with the approval of the Board.
5.	Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the company	As long as they remain current or for 8 financial years whichever is later and may be destroyed thereafter with the approval of the Board
6.	Office copies of general meeting Notices, scrutinizers report and other related papers of the company	As long as they remain current or for 8 financial years whichever is later
7.	Any other register/documents required by any law, for the time being in force	8 financial years
8.	Books of Accounts	8 financial years
9.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means	8 financial years
10.	All books and documents relating to the issue of share certificates, including the blank forms of share certificates under Rule 7(3) of the Companies (Share Capital and Debentures) Rules, 2014	Not less than 30 years and in case of disputed cases shall be preserved permanently
11.	Tape recording(s) or other electronic recording mechanism used for Board meetings held through videoconferencing or audio-visual means under Rule 3(2)(d) of the Companies (Meetings of Board and its Powers) Rules, 2014	At least upto the time of completion of audit of that particular year