

BOROSIL LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

November 12, 2021

1. Legal Framework

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”). These Regulations came into force from December 1, 2015.

As per the Regulation 9 of the Listing Regulations, the Board of Directors (the “Board”) of Borosil Limited (the “Company”) has adopted this policy for Preservation of Documents (the “Policy”).

2. Objective of the Policy

The documents of the Company either in physical or in electronic form are important assets of the Company (“Documents”). Preservation of Documents is an important component of many of the laws which an organization must adhere to in order to ensure compliance of various legal requirements. Therefore, the objective of this Policy is to provide a framework for preservation of documents maintained by the Company under various applicable laws.

3. Classification of Document and its maintenance

The Documents are broadly classified into following categories:

- a. **Permanent Documents:** Certain Documents of the Company are required to be retained permanently under the laws applicable to the Company.
- b. **Documents to be preserved for a period of not less than eight (8) years:** Certain Documents of the Company are required to be retained for a period of not less than eight (8) years under the laws applicable to the Company.

The Policy requires the Company to maintain the Documents in physical form or electronic form or in both, permanently or for specified period of time, as may be applicable. The Documents essentially include all the documents and records that are produced by an employee, whether physical or electronic. A Document may mean and include, but not limited to documents such as memorandums, contracts, agreements, minutes of meetings (Board, Committees or General Meetings), auditor’s reports, employee records, court/tribunal orders, tax returns/assessments, etc. It also includes, but without limitation to documents like emails or messages.

4. Provisions with regard to the Preservation of Documents

The Company from time to time is required to retain certain Documents in order to ensure the legal compliance, and also to accomplish other objectives. Such Documents can be preserved either permanently or for specific period of time. Documents that bear special consideration and minimum retention period are identified in below schedule:

4.1 Documents Retention Schedule

a. Documents as per the Companies Act, 2013 (the Act) and SEBI Regulations

The Company shall maintain all the statutory Documents as per the applicable provisions of the Act read with the rules made thereunder. Further, the Company shall maintain all the records as per the Listing Regulations for not less than eight (8) years.

Documents pertaining to minutes of meetings of board of directors, committees of the board and shareholders, financial statements, audit reports and all statutory registers / records, as prescribed under applicable laws and rules shall be preserved for such period as provided in the respective laws and regulations. Any Document where preservation period is not prescribed under any applicable laws shall be preserved for a period of not less than eight (8) years.

b. Taxation Documents

Taxation documents include, but not limited to documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeals preferred against any claim made by the relevant tax authorities. Tax documents shall be maintained for a period of not less than eight (8) years or for a period of not less than eight (8) years after a final order has been received with respect to any matter, as the case may be.

c. Employment /Personnel Record

The Company is required to keep records or Documents relating to recruitment, employment and personnel information, action taken by or against any employee, complaints by or against any employee. These Documents relating to employment or personnel information shall be retained for a period of not less than eight (8) years.

d. Press Releases

Press Release shall include, but shall not be limited to, any intimation given to the press regarding financial results, profits, meetings of the Board, general meetings, and overall performance of the Company. The Company shall retain all documents relating to Press Releases not less than eight (8) years.

e. Legal Documents

Legal Documents shall include, but shall not be limited to contracts, agreements, legal opinions, pleadings, orders passed by any court or tribunal, judgments, interim orders, documents relating to cases pending in any court or tribunal or any other authority empowered to give a decision on any matter, awards, documents relating to property matters.

A contract shall be preserved for a period of not less than eight (8) years or for not less than eight (8) years after the expiry of the term of the contract, whichever is longer.

Documents relating to any property owned by the Company shall be preserved perpetually. Other property Documents shall be preserved for a period of not less than eight (8) years or for a period of eight (8) years after the rights and obligations in relation to such property cease to exist, whichever is longer.

Orders passed by any court or tribunal or any authority or judgment, which are final in nature and cannot be superseded shall be preserved permanently. Interim orders shall be preserved till a final order is received or for a period of not less than eight (8) years, whichever is longer.

Pleadings shall be preserved for a period of eight (8) years or till the subject matter is disposed of, whichever is longer.

f. Intellectual Property Rights Documents and Licenses

Intellectual property Rights documents shall include, but not be limited to copyrights, trademarks, patents, and industrial designs. Intellectual property rights documents that are owned by the Company shall be preserved by the Company permanently.

Licenses obtained by the Company shall be preserved till the validity of the License and for a period of not less than eight (8) years thereafter, whichever is longer. Licenses that are required to be preserved for longer period shall be decided on case to case basis.

4.2 Documents Maintenance and Storage

All Documents shall be maintained, either in physical form or electronic form or both, by the respective departments of the Company, to which such Document pertains.

4.3 Disposal of Records

The destruction and disposal of Documents shall be done in compliance with the provisions prescribed under the applicable laws and keeping in view this Policy of the Company. All the Documents containing information of a confidential or sensitive nature on paper, card, or electronic media must be securely destroyed when it is no longer required.

4.4 Hold On record destruction and deletion

If a lawsuit or other proceeding involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, must cease immediately. Documents relating to the lawsuit or potential legal issue will then be retained and organized under the supervision of the General Counsel's Office.

4.5 Electronic Documents including emails

All electronic communication systems as well as all communications and information, transmitted, received, or contained on the Company's information systems are the property of the Company. Such communication and information shall be preserved in accordance with this Policy.

5. Policy Enforcement

The employees of the Company shall strictly comply with this Policy. Each Head of the Function /department shall lay down process for maintenance of Documents pertaining to the respective Function/department in compliance of this Policy.

If an employee has reasons to believe, or the Company informs the employee concerned, that Company Documents are relevant to litigation or potential litigation (i.e. a dispute that could result in litigation), then the employee must preserve those Documents until the Legal department determines that the Documents are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those Documents. If an employee(s) believe that exception may apply or have any question regarding the possible applicability of that exception, he/she may contact the General Counsel / Company Secretary.

While minimum retention periods are suggested in regard to certain Documents, the retention of the Documents not included in the above schedules shall be determined by the Head of the Function/Department, in line with the policy that governs those Documents or by the application of the general guidelines affecting such Documents, as well as any other pertinent factors.

6. General

Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy.

7. Effective Date

The Policy as approved by the Board of Directors shall be effective from November 12, 2021.

8. Compliance

Failure to comply with this Policy may result in disciplinary action. Questions about this Policy should be referred to the office of the General Counsel / Company Secretary who is in charge of administering, enforcing and updating this Policy.

9. Amendments

The Company may amend the Policy as and when it deems necessary either pursuant to any change in law or otherwise. The Company shall be free to devise and implement any supplementary or other policies and guidelines in respect hereof for better implementation of this Policy.