

Rama

Rama Petrochemicals Limited

MSME REGN NO. : UDYAM-MH-27-0000324

CIN : L23200MH1985PLC035187

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| Name of document | Policy on Preservation of Documents |
| Applicability | Rama Petrochemicals Limited |
| Effective Date | November 10,2021 |

1. Introduction

The Board of Directors ("the Board") of Rama Petrochemicals Limited ("the Company") has adopted this policy on preservation of documents ("this Policy").

This Policy is prepared in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Listing Regulations") and shall be effective from November 10,2021.

2. Objective:

This Policy contains guidelines for identifying Documents (defined later) that need to be maintained, the period of preservation of such Documents and its destruction/disposal. This Policy aims to provide efficient and systematic control on the periodicity and destruction of business related Documents.

3. Definitions

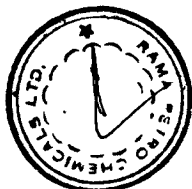
The capitalized terms used in this Policy shall have the meaning ascribed to such terms in the Companies Act, 2013, rules made thereunder and the Listing Regulations (collectively, the 'Statutory Provisions'), as the case may be.

For the purpose of this Policy, "Document" means document maintained in any medium, (paper, electronic, optical, magnetic, etc.), that is created, received, transmitted or used in the course of and in relation to the business of the Company.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

4. Scope

This Policy applies to all departments and business functions of the Company but does not apply to personal or non-business information.



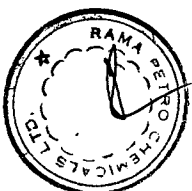
5. Periodicity of preservation of Documents

The below guidelines shall be followed for proper preservation of documents.

| Document Category | Document type | Preservation period | Mode of preservation |
|-------------------------|--|--|--------------------------------|
| Company Operations | <ul style="list-style-type: none"> • Memorandum / Articles of Association • Certificate of incorporation • Certificate of commencement of business • Licenses, certificates, approvals and other such documents issued by Central/State Government and any other statutory and/or regulatory body • Orders, judgements of judicial authorities • Policies, Charters and Codes of the Company • Other related Documents | Permanent | Physical and/or electronically |
| Tax and Finance records | <ul style="list-style-type: none"> • Books of accounts, including inter-alia, financial statements, vouchers relevant to entry in books of accounts, audit records, invoices, expense records, bank records etc.in accordance with the applicable provisions of Companies Act, 2013, Income tax Act, and any other applicable laws. • Application/correspondence with various Direct and Indirect tax authorities • Excise invoices / bills / challans • Returns and Assessment Records • GST documents • All copies of registrations • Loan related Documents • Agreements pertaining to securities • Documents related to all other taxes and duties • Other related Documents | Eight financial years or such period as may be specified under applicable law/statute etc. | Physical and/or electronically |



| Document Category | Document type | Preservation period | Mode of preservation |
|---------------------|--|--|--------------------------------|
| Secretarial records | <ul style="list-style-type: none"> • Notice, agenda and notes to agenda of meetings of the Board and its Committees • Minutes of the meetings of the Board of Directors and of its Committees • Minutes of all meetings of shareholders • Office copies of Notices, scrutinizer's report and other documents related to meetings of shareholders/ creditors of the Company • Attendance register of the meetings of the Board and its Committees • Statutory Registers, indices, returns, forms as required under various applicable laws / statutes / regulations etc. • Statutory filings with the Stock Exchanges, SEBI, Ministry of Corporate Affairs, Reserve Bank of India and any other statutory/regulatory authority • Applications and approvals for issuance and listing of securities • Press releases, publicly filed documents • Land title deeds/documents/receipts • Other Documents required to be permanently preserved under any applicable law/regulation/statute etc. • Other related Documents | Permanent | Physical and/or electronically |
| | Documents specified to be preserved for eight financial years under any applicable law/regulation/statute etc. | Eight financial years | Physical and/or electronically |
| | Details relating to unclaimed/unpaid divided | Seven years | Physical and/or electronically |
| Legal | Executed copies of contracts/agreements entered by the Company | Five years beyond the life of the contract or such period as may be specified under applicable law/statute etc | Physical and/or electronically |



| Document Category | Document type | Preservation period | Mode of preservation |
|---------------------------------------|--|--|--------------------------------|
| | <ul style="list-style-type: none"> • Documents relating to business projects/contracts/bids • Case file of all disputes with different authorities. • Registration/renewal Documents • Documents relating to development of intellectual property • All Documents containing trade secrets • Original and supplementary license user agreements • Other related Documents | Permanent | Physical and/or electronically |
| | Documents relevant to litigation or any potential litigation (dispute that may result in litigation), claim, audit, investigation or enforcement action. | Until the Legal Department of the Company determines in writing that such Documents are no longer needed. | Physical and/or electronically |
| Production, purchases related records | <ul style="list-style-type: none"> • Production procedures, production data, system based records, MIS, yield, rejections etc. • Other production related records required to be maintained under any applicable law/statute etc. • Purchase orders, annual rate contracts, quotations and comparative quotation analysis etc. • Bill of entry/bill of lading, shipping bill, airway bill etc. | Eight financial years or such period as may be specified under applicable law/statute etc. | Physical and/or electronically |
| Strategy/projects | <ul style="list-style-type: none"> • Documents relating to green field / brown field projects • Statistical information, negotiation drafts, analysis reports etc. • Other related documents | Five years beyond the life of the project/ assignment or such period as may be specified under applicable law/statute etc. | Physical and/or electronically |



| Document Category | Document type | Preservation period | Mode of preservation |
|--|---|--|--------------------------------|
| Employment/ Personnel records | <ul style="list-style-type: none"> Documents relating to individual personnel records, payroll, salary history, bonuses, performance reviews etc. Other personnel related documents | Eight financial years or such period as may be specified under applicable law/statute etc. | Physical and/or electronically |
| Information technology | <ul style="list-style-type: none"> Documents in relation to procurement of IT hardware, software, licenses etc. Operations & User Manuals Licenses and Information Security Register Server logs Disaster Recovery Site logs Inventory of back up data Other related Documents | Eight financial years or such period as may be specified under applicable law/statute etc. | Physical and/or electronically |
| Marketing and Sales records | <ul style="list-style-type: none"> Final copies of marketing and sales documents Sales & Marketing policies Excise Invoices Debit Note/Credit Notes Credit Appraisal Forms & Ratings Agreements with Agents Collection Advices Related MIS Other related Documents | Eight financial years or such period as may be specified under applicable law/statute etc. | Physical and/or electronically |
| International | Documents governed by the jurisdiction of foreign country | As per requirement of the concerned country | Physical and/or electronically |
| Incidental or other business related information | <ul style="list-style-type: none"> Drafts and preliminary versions of documents superseded by work paper and other transitory information | As long as it remains relevant | Physical and/or electronically |
| | <ul style="list-style-type: none"> Any other Document relating to the business of the Company | 180 days or as long as it remains current | Physical and/or electronically |

Where the preservation period of Documents is not included in the above identified categories, such period shall be determined by the application of the general guidelines affecting Document preservation identified in this Policy, as well as any other pertinent factors.



Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department in writing.

6. Accessibility and retrieval of records

i. Retention of Physical records

Preserved records shall be kept confidentially, securely with access control and with ease of retrieval, whether in-house or externally. Measures should be taken for physical security of the records maintained like selection of area of record room, firefighting device, access control, etc.

ii. Retention of Electronic Records

Wherever allowed/required by any law/statute, records may be maintained in electronic form. In case records and documents are maintained in electronic form, all the requirements relating to Information Technology Act, 2000, including any statutory amendment(s) or modification(s) thereto, shall be adhered to.

In case of switch-over to another electronic system, it should be ensured that all the records in the old electronic system should be migrated to new electronic system and all old records are accessible in the new system.

7. Destruction of documents

All information generated in the course of the Company's business activities that is not required to be retained must be safely destroyed or discarded as soon as practicable, but in any event within 180 days of the completion of the project/assignment/contract.

i. Physical:

The Documents should be destroyed at the end of the preservation period specified under Clause 5 of this Policy. The destruction should be carried out in a way that preserves the confidentiality of any information they contain, if so required. A record should be kept about the Documents that have been destroyed.

Records which are required to be maintained for certain period of time, shall be added to the archive when it no longer has a business need. Files or items when added to the archive will be recorded on a database that shall be maintained by the facilities and retrieving the records from the archive must be for valid business reasons.

Documents should be shredded through a paper shredding machine and not sold as scrap.

ii. Electronic

Electronic information, including e-mails that are no longer required to be retained, must be purged using appropriate techniques which ensure that the data cannot be reconstructed from the storage media on which it resided. Records stored on magnetic media must be destroyed by reformatting at least once. However, the backup copies of the records must also be destroyed.



8. Responsibility

Functional heads at the HO and of respective Units/Zones/Depots shall be responsible for monitoring the implementation of this Policy.

9. Policy enforcement

Failure to comply with this Policy may result in punitive action against the concerned employee. Questions regarding enforcement of the Policy should be referred to the Functional Heads or the Company Secretary of the Company.

10. Review and Amendment

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the Statutory Provisions and remains effective.

This Policy shall be reviewed periodically and may be amended by the Board, as may be deemed necessary.

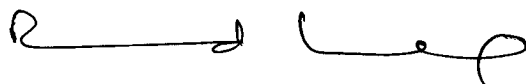
11. Interpretation

In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/modification in the Statutory Provisions shall automatically apply to this Policy.

12. Amendments:

The policy is a public document and shall be uploaded on the website of the Company. The Board shall have the power to amend the policy or replace the policy entirely with a new policy. However, the Managing Director/Whole Time Director and the Company Secretary are jointly authorized to provide clarifications or to amend the Policy to give effect to any changes / amendments notified by the Securities Exchange Board of India. Consequently, the policy shall be placed before the Board for their noting and ratification.

For RAMA PETROCHEMICALS LIMITED

A handwritten signature in black ink, appearing to read "R.D. Jog".

**R.D. JOG
COMPANY SECRETARY**