

POLICY FOR PRESERVATION OF DOCUMENTS UNDER SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 (the “Listing Regulations”)

The Policy for Preservation of Documents (the “Policy”) pursuant to Regulation 9 of the SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 (the “Listing Regulations”).

Objective

Finolex Industries Limited (the “Company”) is required to maintain certain types of corporate records for specified period of time. The objective of the policy is to specify the need of preservation of Company’s records in terms of Regulation 9 of Listing Regulations.

Definitions

Definitions or phrases used in the Policy will have same meaning as in the Listing Regulations or Companies Act, 2013.

Policy for Preservation of Documents

1. Corporate records are all paper or electronic records that are produced in functioning the duties of the Company.
2. Generally, all corporate records (whether electronic or paper) of the Company are to be retained for no less than three (3) years, and may be destroyed thereafter.
3. If 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.
4. The policy should be reviewed periodically by the senior Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The senior management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.
5. The documents which are required to preserve permanently pursuant to provisions of the Companies Act, 2013 and regulations made there under or under any statutes or rules made there under are required to maintain permanently as per the requirements of the specific status and regulations or guidelines made there under.

6. Books of Accounts and Tax Records: Books of accounts and Tax records should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used.
7. If there are provisions in particular statutes relating to keeping of records of the Company the said provisions should be complied with.
8. In other cases the Board or Board nominated team will decide from time to time the period for which the records of the Company should preserved.
9. In the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.
10. The Company has made appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability.
11. The employee deal with the maintaining the relevant records of the Company should take reasonable precautions and care to preserve the records as per the requirements.
12. Questions regarding this policy should be addressed to compliance officer of the Company at investors@finolexind.com

Approval

This Policy is approved by the Board of Directors of the Company at its meeting held on 6th November, 2015.

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