



Axel Polymers Limited

Regd. Office & Works : 309, Mokshi, Sankarda-Savli Road, Tal. Savli
Dist. Vadodara - 391780, India. • Telefax : +91-2667-244395, 244439
info@axelindia.com • www.axelindia.com • CIN : L 25200GJ1992PLC017678

POLICY FOR PRESERVATION OF DOCUMENTS **(Effective from 01.02.2016)**

1. LEGAL FRAMEWORK

The Policy is framed in accordance with the Requirements of Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015. According to this Regulation all Listed Entities Shall have Policy for Preservation of Documents. This policy is prepared in commensurate with the above said Regulations.

2. DEFINITIONS

“**Board of Directors**” or “**Board**” means the Board of Directors of Axel Polymers Limited, as constituted from time to time.

“**Company**” means Axel Polymers Limited.

“**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc. and the like as required to be maintained under any law or regulations for the time being in force.

“**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 including any modifications, clarifications, circulars or reenactment thereof.

3. OBJECTIVE

This Policy sets the Standards for managing, storing, and Preservations of Documents of the Company broadly classified in the following two categories.

A. The Documents of a permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made their in from time to time.

Provided that all such modifications, amendments, additions, deletions, in the documents shall also be preserved permanently by the Company.

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure - 2) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, addition, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletion in the documents shall also be preserved for a term not less than eight years.

C. The Documents disseminated on the website of the Company shall be made available for the period of 5 Years in Compliance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Provided further that the Company may keep the documents as specified above in am physical or electronic mode.



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4. ROLES AND RESPONSIBILITIES

The respective Departmental heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

5. GENERAL

Notwithstanding anything contained in this policy the Company shall ensure compliance with any additional requirement as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company from time to time.

6. DESTRUCTIONS OF DOCUMENTS

After the expiry of statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant This applies to both Physical and Electronic documents.

7. DISSEMINATION OF POLICY

For all Employees and Directors, a copy of this policy shall be posted on the website of the Company.

8. AMENDMENTS

The Board may subject to the applicable laws amend any provisions(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendments or modification shall be inconsistent with the applicable provisions of any law for the time being in force. The Chief Financial Officer or Managing Director of the Company are authorised to add the list of documents to be preserved permanently or for the period of eight years as the case may be.

For Axel Polymers Limited,

A.B. Bodhanwala
Managing Director
DIN: 00421362



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Annexure-1

Documents whose preservation shall be permanent in nature

S. No	Nature of Document(s)
01	Common Seal of the Company
02	Certificate of Incorporation
03	Certificate of Change of Name(if any)
04	Memorandum and Articles of Association as amended from time to time
05	Minutes of Board Meetings, General Meetings and various Committee Meetings
06	Licenses and Statutory approvals
07	Statutory Registers required under the Law
08	Audited Financial Statements
09	Material Agreements/Contracts
10	Orders issued by Courts/Statutory Bodies
11	Investment Documents/proof including certificates etc.
12	Papers relating to legal matters/litigations.
13	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.



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Annexure-2

Documents with preservation period of not less than eight years after completion of the relevant transactions

S. No	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s)
03	Office copies of Notice of General Meeting and related papers
04	Personnel Documents
05	Insurance Policies/ Claims under various policies
06	Correspondence with department/shareholders
07	Non Statutory Registers/Documents.
08	Films, Videos, CDs, DVDs, tapes etc.
09	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.