

POLICY FOR PRESERVATION OF DOCUMENTS

OF

MULTIBASE INDIA LIMITED

(CIN No. L01122DD1991PLC002959)

**74/5 – 6, Daman Industrial Estate
Kadaiya, Nani Daman – 396 210 (UT)**

1. PREAMBLE:

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), Multibase India Limited (the Company) is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations.

In this context, the Board of Directors (“Board”) of Multibase India Limited (“Company”) at its meeting held on February 10, 2016 approved the Policy for Preservation of Documents.

This policy is framed as per requirement of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. OBJECTIVE:

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under various laws applicable to the Company

3. DEFINITION:

- a. **Document(s)** refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or duplicate copies.
- b. **“Electronic form”** means on any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- c. **“Maintenance”** means keeping registers and records, either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such registers and records.
- d. **“Policy”** means Board Policy on Preservation of Documents.

“Preservation” means to keep in good order; to prevent from being damaged or destroyed.

“Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

“Register” means a register maintained under the Companies Act, 2013 or the Securities and Exchange Board of India Act, 1992.

4. PRESERVATION OF DOCUMENTS:

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial standards, the Listing Regulations and any other laws, rules, regulations as may be applicable to the Company from time to time.

5. CLASSIFICATION OF DOCUMENTS:

- a) documents whose preservation shall be permanent in nature, shall mean all documents which are statutorily required be retained permanently;
- b) documents with preservation period of not less than 8 years after completion of the relevant transactions including website disclosures except those falling under Regulation 30 of the said Regulation covered under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, shall be retained for a period of not less than 8 years from the date of occurrence of the event.

Documents covered under the aforesaid two categories are covered under **Annexure 1 and 2** and shall be accordingly retained.

6. MAINTENANCE OF DOCUMENTS:

The Company may keep documents covered under this policy in physical or electronic mode subject to the same being permissible in accordance with the relevant law.

The responsibility for the safeguarding of the documents shall vest with the owner of the documents at a level not below the Head of the Department. The documents shall be maintained in a manner that it is not subject to any unauthorized access or alteration or modification other than by an owner of the document or any other officer authorized by him.

The periodicity of the retention/preservation shall be reviewed from time to time to ensure that no documents are retained beyond the period prescribed by the Policy unless required otherwise.

7. DISPOSAL OF DOCUMENTS:

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative shall be followed for the records which are

duplicate/unimportant/irrelevant. The confidential papers should be shredded off. Documents may be retained for longer duration for audit or litigation purposes.

8. MONITORING AND REVIEW:

This Policy will be regularly monitored and reviewed to ensure that it remains relevant to the Company's business aims and requirements. Compliance with this Policy and associated procedures will be monitored on an ongoing basis through self-assessment procedures and reviews.

The Company shall follow the Dow corning Internal Asset management policy for preservation of documents other than those covered under this policy.

9. AMENDMENT:

The Board of Directors and/or the Managing Director has the right to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever, subject, however, to the condition that such alterations will be in consonance with the provisions of the applicable Laws.

Annexures 1 and 2 contain list of documents whose preservation shall be permanent in nature and documents with preservation period of 8 years respectively.

10. ENFORCEMENT OF THE POLICY

The Policy shall be enforced with effect from the date of its approval by the Board. The Company Secretary shall be authorized to communicate the Policy to all concerned and to ensure the effective implementation thereof.

ANNEXURE 1

Documents whose preservation shall be permanent in nature

Sr.No	Nature of Documents
1.	Common Seal
2.	Original signed memorandum and articles of Association of the Company
3.	Documents of Incorporation
4.	Minutes Books of Board Meetings, General Meetings and Committee Meetings
5.	Statutory Registers
6.	Licences, permission, approvals, etc. from the statutory authorities till its validity
7.	Statutory Forms and disclosures except for routine compliance
8.	Scrutinizers' Report
9.	Intellectual Property documents
10.	Annual Reports
11.	Listing Agreements executed with the stock exchanges
12.	Agreements relating to acquisition of properties
13.	Blank Share Certificates
14.	Such other documents as may be prescribed by law

ANNEXURE 2

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

S.No	Nature of Documents
1.	Copies of annual returns under Section 92 of the Act along with copies of all certificates and documents annexed thereto
2.	Board Agenda and supporting documents
3.	Attendance Registers
4.	Changes to Memorandum and Articles of Association of the Company, if any
5.	Register of deposits accepted or renewed, if any
6.	Office copies of Notice of General Meeting and related papers
7.	Office copies of Notice of Board Meeting/ committee Meeting, Notes on Agenda and other related papers
8.	All Notices pertaining to disclosures of interest of Directors
9.	Instruments creating a charge or modification
10.	Books of accounts together with , financial statements etc.
11.	Proof of dispatch of notices, wherever required
12.	Tax records
13.	All submissions made to the stock exchanges in compliance with the listing agreements
14.	Such other documents as may be prescribed by law