KOTHARI FERMENTATION AND BIOCHEM LIMITED
CIN: L72411DL1990PLC042502
Regd. Office: 16, Community Centre, First Floor, Saket, New Delhi - 110 017
Tel: 011-26850004, Fax: 011-41664840, E-Mail – kfbl@airtelmail.in
Website: www.kothariyeast.in

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

[Under Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. PURPOSE AND SCOPE

1.1 The purpose of this document is to present a policy statement for The Kothari Fermentation and Biochem Limited (Company) regarding preservation of its documents and archival of documents in the website in accordance with the provisions of the Companies Act, 2013 and Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR").

1.2 The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

2.1 The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:

A. Documents whose preservation shall be permanent in nature;
B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions;
C. Documents whose preservation shall be for a minimum period of three years after completion of the event.

The details of documents for the above three categories are given in the Annexure.

3. PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

3.1 All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

4. PERIODICAL REVIEW OF THE POLICY

4.1 The Chief Executive Officer of the Company is authorised to periodically review the policy and make such changes as considered necessary.

5. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

5.1 In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

6. STATUTORY REQUIREMENTS

6.1 If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

7. WEB ARCHIVAL POLICY

7.1 The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s).

7.2 Such disclosures shall be retained on the website of the Company for a minimum period of five years.

7.3 At the end of the fifth year the information shall be archived and preserved for a further period of three years.

ANNEXURE

A. Documents whose preservation shall be permanent in nature:

1. Accounting and Finance records including Annual Financial statements and Audit Reports
2. Investment records.
3. Tax records including annual returns
4. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks.
5. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records.
6. Personal files of individual employees.
7. Any other record as may be decided by the Chief Executive Officer of the Company from time to time.

B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions:

1. Books of Accounts, Bank Statements and vouchers
2. Filings with Stock Exchanges, Registrar of Companies and other statutory authorities.
3. Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retiral related Records, etc.
4. Corporate Social Responsibility Records
5. Sponsorship Projects Records
6. Correspondence and Internal Memoranda
7. Any other record as may be decided by the Chief Executive Officer of the Company from time to time.

C. Documents whose preservation shall be for a minimum period of three years after completion of the event:

1. Security Deposit Receipts
2. Tender Documents
3. Lease Deeds and Contracts
4. Legal files
5. Insurance Records including policies and claims.
6. All e-mail correspondence, internal & external.
7. Any other record as may be decided by the Chief Executive Officer of the Company from time to time.