

Sequent Policy on Preservation and Archival of Documents

Introduction

The Securities Exchange Board of India (“SEBI”) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Regulation”) on September 2, 2015, which is effective from December 1, 2015.

As per Regulation 9 of the Regulation, the Company has adopted a policy namely “Sequent Policy on Preservation and Archival of Documents” (“the Policy”). The policy ensures that all the necessary documents and records of the Company are adequately protected, preserved and disposed as required under various statutes, laws, rules, regulations and Company’s Policies for the time being in force. The policy also governs the archival of documents hosted on the website of the Company. The Policy embarks obligation on the employees of the Company for retaining and preserving the documents, which are required to be maintained.

Definitions:

“Applicable Law” means any law, rules, circulars, guidelines or standards under which the preservation of the Documents has been prescribed.

“Board” means the Board of Directors of the Company.

“Company” includes Sequent Scientific Limited and all its subsidiaries and joint ventures incorporated in India or outside India.

“Documents” means all papers, certificates, records, registers, agreements, contracts, notices, orders, declarations, files, books, letters and letterheads etc., as required to be maintained as required under various statutes, laws, rules, regulations for the time being in force and Company’s Policies.

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

“Electronic form” with reference to information means, any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device;

Scope of the Policy:

The policy is applicable to all Departments and Employees of the Company and governs all the necessary documents and records of the Company to be protected, preserved and disposed as required under various statutes, laws, rules, regulations and Company’s Policies for the time being in force.

Provisions for Preservation and Archival of Documents:

The Company shall maintain and preserve the documents either in physical or electronic mode as permitted by the applicable laws. .

The documents of the Company shall be preserved in the following manner:

1. Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, additions or deletions or any changes made therein from time to time.

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

2. Documents whose preservation shall be temporary in nature shall be preserved in the following manner:
 - All such documents for which period of preservation is prescribed under the applicable laws shall be preserved for such period as prescribed under the applicable laws but not less than 8 (Eight) years.
 - All other documents for which the period of preservation is not prescribed under any laws shall be preserved for a minimum period of 8 (Eight) years or any such specific period as the Company deems necessary.

All departments of the Company shall ensure that the documents pertaining to their department are preserved as per the Policy. It shall be the duty of the departmental heads to ensure that they comply with the requirements of the Policy.

Any violation of this Policy may result in immediate termination of employment or serious action against the Employees including the departmental heads as may be decided by the Board of Directors. Board of Directors at its own discretion may give an opportunity to any employee to represent himself/ herself before the Board of Directors.

Further, the Company shall ensure that all the events or information as disclosed to the stock exchange shall be made available on the Company's website i.e. www.sequent.in for a period of 5 (Five) years and thereafter shall be maintained in local server for a period of 3 (Three) years.

The Company has identified a list of documents with their respective period of preservation which is given as an annexure to this policy. The list shall be an illustrative and not an exhaustive list.

Disposal and Destruction of Documents

The documents of the Company shall be disposed or destroyed after the period of preservation as prescribed in the Policy or after lapse of such period of preservation as may be prescribed under applicable laws. It shall be the responsibility of the employees of the Company to dispose or destroy the documents pertaining to their departments in the presence of their departmental heads.

A list of the documents destroyed or disposed shall be maintained by each Departmental Heads.

Amendments and Updates:

Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

Annexure

1. Documents whose preservation shall be permanent in nature:

Sl. No.	Particulars
1.	Documents and Information filed with ROC For Incorporation of Company
2.	Certificate of incorporation
3.	Certificate for commencement of business
4.	Memorandum and Articles of Association
5.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
6.	Minutes Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
7.	Register and Index of Members, debenture-holders, if any or other security holders
8.	Register of Contract or Arrangements in which Directors are Interested
9.	Register of Charges
10.	Register of Transfer of shares
11.	Registers of investments in securities not held in the name of the Company under Companies Act, 2013
12.	Register of Directors and Key Managerial Personnel
13.	Cancelled Share certificates
14.	Original Purchase and Sale Agreement
15.	License and Permissions
16.	Annual Financial Statements and Audit Reports
17.	Court Orders
18.	Any other documents as may be required to maintain in terms of applicable law(s) maintained and preserved from time to time

2. Documents whose preservation is not permanent in nature:

Sl. No.	Particulars	Preservation Period
1.	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
2.	Instruments creating charge	8 years from the date of creating charge
3.	Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8 years
4.	Attendance Register	8 years
5.	Income Tax papers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
6.	Employees Information Records	8 years after resignation/ separation
7.	Register of Shares or other securities brought back	8 years
8.	Register of Proxy	8 years
9.	Annual Reports	8 years
10.	Register of Deposits	8 (Eight) year from the Financial year in which the latest entry is made in the register
11.	Register of Fixed Deposits	8 Years
12.	Disclosure of interest by the Directors	8 Years