

DOCUMENT PRESERVATION AND ARCHIVAL POLICY

STYRENIX PERFORMANCE MATERIALS LIMITED

Version 2 July 2022

Authorized by Board of Directors

No part of this document should be reproduced or distributed without the prior permission of Styrenix Performance Materials Limited.

In India, regulatory framework as laid down under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires the companies to put in place policy framework for preservation and archival of documents. Accordingly, the Board of Directors of the Company have formally adopted the following written policy.

The Company considers records created or received during the normal course of business as a company asset. This includes all documents, regardless of whether they are electronic or hard copy and it is the intent of the Company to identify, retain and safeguard all records in accordance with business needs and applicable legal requirements, in an efficient and effective manner.

This policy is intended to develop a guideline for safety, security, preservation and archival of documents.

DEFINITIONS

- a. **“Board of Directors”** or “the Board” means the Board of Directors of Styrenix Performance Materials Limited, as constituted from time to time.
- b. **“Company”** means Styrenix Performance Materials Limited.
- c. **“Company Record”** shall mean any record, information or data, regardless of the medium in which it is stored, related to Company’s business activities that is generated or received during the normal course of business and shall include the recordings of the board and committee meetings which are conducted through video conferencing mode.
- d. **“Listing Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- e. **“Policy”** means this Document Preservation and Archival policy.
- f. **“Material Events”** means events as specified in Schedule III to the Listing Regulations from time to time upon occurrence of which the Company shall make disclosures to stock exchange(s) and host such disclosures on its website.

PRESERVATION OF COMPANY RECORDS

- i. The Company records, which are required to be preserved permanently, as per applicable law in force, from time to time, shall be maintained and preserved permanently by the Company, subject to the modifications, amendments, additions, deletions, or any changes made therein from time to time. An illustrative list is enclosed as Annexure 1.

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

- ii. The Company records, which are required to be maintained and preserved for a specified time period, shall be preserved by the Company for such time period, subject to the

modifications, amendments, additions, deletions or any changes made therein from time to time. An illustrative list is enclosed as Annexure 2(i) and (ii).

Provided that all such modifications, amendments, additions, or deletions in the Company records shall also be preserved for a term not less than eight years and for one year in case of video recordings of the meetings.

Provided further that the Company may keep the Company records as specified above in an electronic mode.

All Company records other than as listed in Annexure 1 & 2 shall be preserved as specified by relevant laws in force, from time to time. Respective custodians shall be responsible for compliance with this policy with respect to documents pertaining to the respective Company records in their custody.

WEBSITE ARCHIVAL

All material events and information disclosed to the Stock Exchanges will remain posted on the website for a minimum period of 5(five) years. Thereafter depending upon the nature, materiality, impact and relevance of the material event, the disclosure of such material event can continue to remain hosted on the Company's website for a period of time as may be decided by the Company from time to time. After the completion of 5 years or such further period as decided by the Company, the material events and information disclosed will be deleted / removed from the website.

REVIEW OF POLICY

- a. The Board of Directors shall review this policy periodically.
- b. In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed off or as may be decided by the Management.
- c. Any subsequent amendment(s)/modification(s) in the Listing Regulations and/or other applicable Laws in this regard shall automatically apply to this Policy. The Managing Director, Chief Financial Officer and the Company Secretary are jointly authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall not be inconsistent with the provisions of the Listing Regulations.
- d. Any clarifications / questions regarding this policy should be addressed to the Company Secretary.

ANNEXURE 1

Illustrative list of Company records to be maintained and preserved permanently

1. Memorandum and Articles of Association of the Company.
2. Minutes of the General Meeting of the Shareholders.
3. Minutes of passing of resolution by Postal Ballot.
4. Minutes of the meetings Board and Committee(s) of Directors.
5. Register and Index of Members.
6. Statutory Registers under the Companies Act, 2013 and Rules thereunder.
7. Any other document as may be required to be maintained and preserved permanently, in accordance with applicable laws, from time to time.

ANNEXURE 2

- (i) Illustrative list of Company records to be maintained and preserved for a period of at least eight years:
 1. Books of accounts.
 2. Annual returns.
 3. Disclosures of interest / Notice by a Director of his interest.
 4. Any other document as may be required to be maintained and preserved for a period of at least eight years, in accordance with applicable laws, from time to time.

- (ii) Illustrative list of Company records to be maintained and preserved for a period of at least a year:
 1. Recordings of Board and its Committee meetings, where applicable
 2. Recordings of Annual General Meeting, where applicable