DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

DCM SHRIRAM FINE CHEMICALS LIMITED

WEBSITE CONTENT & ARCHIVAL POLICY

(Pursuant to Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015)

(Approved by the Board of Directors on 24.12.2025)

1. PREAMBLE

The Board of Directors (the "Board") of DCM Shriram Fine Chemicals Ltd. (the "Company"), has adopted the following Policy and procedures with regard to retention of website content pursuant to SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, ['LODR Regulations'].

The above Regulations require every listed company to post various disclosures of corporate actions, events, documents, etc. on the website of the Company. These disclosures will remain hosted on the website for a minimum period five years and thereafter in accordance with the archival policy of the Company.

2. SCOPE

This Policy shall govern the disclosure and archival of such contents only which have been disclosed on the website of the Company in compliance with the above mentioned Regulations and which are disclosed to the Stock Exchange/s. Other contents displayed/ hosted on the website shall be out of purview of the Policy and can be archived/ deleted at the discretion of the Company.

3. OBJECTIVES OF THE POLICY

The main objective of this Policy is to ensure that all the documents, disclosures made to the Stock Exchange/s and required to be displayed on the website of the Company as per Regulations 30(8) and 46 are hosted on the Website and transferred to the Archives folder of the Website of the Company after the completion of five years from the date of disclosure.

The major objectives of the Policy are:

- Identification of information, documents, events, etc., which are required to be disclosed on the website of the Company.
- Ensure that all the information is disclosed at the relevant link with uniformity on each disclosure.
- Ensure that all the information, documents, events disclosed on the website of the Company, unless otherwise specified in the Act, shall remain on the

website for a period of five years from the date of disclosure.

- Documents which are required to be hosted on the website for a particular period, shall not be deleted after the due date, but saved to archives folder.
- Certain documents like Policies, Code of Conduct and other similar documents, which are required to be continuously displayed on the website, shall not be archived.

4. DEFINITIONS

- 'Act' means the Companies Act, 2013, Rules framed thereunder and any amendment(s) thereto;

- 'Board of Directors' or `Board', means the collective body of the Directors of the Company;

- 'Company', 'this Company', 'the Company', 'Company', wherever occur in the policy shall mean "DCM Shriram Fine Chemicals Limited."

- 'Compliance Officer' shall means Company Secretary or any other person so appointed by the Board of Directors from time to time.

- 'Policy' or 'This Policy' means, "Website Content & Archival Policy."

5. INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Act, LODR Regulations, and/or any other SEBI Regulation(s) as amended from time to time.

6. GUIDELINES

The Company being listed on BSE & NSE, regularly sends various information, financial statements, notices and other disclosures, as required under the LODR Regulations to the Stock Exchanges. As required under the Act and the LODR Regulations the same are also displayed and hosted on the Website of the Company.

Regulation 46 of LODR Regulations requires the listed companies to maintain a functional website containing basic information about the Company and to update the same within two working days of any change taking place therein.

Regulation 30(8) requires the listed companies to disclose on its website all such events or information which have been disclosed to Stock exchanges under these Regulations, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the Archival Policy of the Company, as disclosed on its website.

7. POLICY

The required documents, information, disclosures, notices, policies as provided under the LODR Regulations and the Act, which are required to be disclosed on the website shall be uploaded on the website of the Company within the prescribed time limit. The website of the Company shall be reviewed at regular intervals for ensuring that all the above mentioned disclosures are uploaded in due time and are available on the website of the Company.

These disclosures, unless otherwise mentioned in the Act/ Regulations, shall be hosted on the website for the specified period and thereafter shall be moved/transferred to Archives folders under the respective heads/ sub-folders, in a way so that these can be searched easily as and when required by any person. The documents/disclosures shall be kept in the archive folders till such time as may be required by law from time to time.

(A) The following information shall be uploaded under a separate section of on the **Company's** website and shall be updated within two working days from the date of occurrence of change:

- Details of Company's business.
- Memorandum of Association and Articles of Association.
- Brief profile of Board of Directors including Directorship and full-time positions in body corporates.
- Terms and conditions of appointment of Independent Directors.
- Composition of various committees of Board of Directors.
- Code of Conduct of Board of Directors and Senior Management Personnel.
- Details of establishment of Vigil Mechanism/ Whistle Blower policy.
- Criteria of making payments to Non-Executive Directors, if the same has not been disclosed in annual report.
- Policy on dealing with Related Party Transactions.
- Policy for determining 'material' subsidiaries.
- Details of familiarization programmes imparted to Independent Directors including the following details:
  (i) number of programmes attended by independent directors (during the year and on a cumulative basis till date),
  (ii) number of hours spent by independent directors in such programmes (during the year and on cumulative basis till date), and
  (iii) other relevant details
- Email address for grievance redressal and other relevant details.
- Contact information of the designated officials who are responsible for assisting and handling investor grievances.
- Financial information including:
  - Notice of meeting of the Board of Directors where financial results shall be discussed;

- Financial results, on conclusion of the meeting of the Board of Directors where the financial results were approved;
- Complete copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report etc.

- Shareholding Pattern.
- Details of agreements entered into with the media companies and/or their associates, etc.
- Schedule of analysts or institutional investors meet at least two working days in advance (excluding the date of the intimation and the date of the meet).
- Presentations prepared by the Company for analysts or institutional investors meet, post earnings or quarterly calls prior to beginning of such events.
- Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means, in the following manner:
  i. The audio recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier;
  ii. the video recordings, if any, shall be made available on the website within forty-eight hours from the conclusion of such call;
  iii. the transcripts of such calls shall be made available on the website along with simultaneous submission to recognized stock exchanges within five working days of the conclusion of such calls.
- New name and the old name of the Company, for a continuous period of one year, from the date of the last name change, if applicable.
- Financial Results published in newspapers.
- Notices given to shareholders by newspaper advertisement.
- All credit ratings obtained by the Company for all its outstanding instruments, updated immediately as and when there is any revisions in any of the ratings.
- Separate audited financial statements of each subsidiary of the Company in respect of a relevant financial year, uploaded at least twenty one days prior to the date of the Annual General Meeting which has been called to, inter alia, consider accounts of that financial year.
- For subsidiary incorporated outside India—
  a) where such subsidiary is statutorily required to prepare consolidated financial statement under any law of the country of its incorporation, the consolidated financial statement of such subsidiary is to be placed on the website of the Company;
  b) where such subsidiary is not required to get its financial statement audited under any law of the country of its incorporation and which does not get such financial statement audited, the Company may place such unaudited financial statement on its website and where such financial statement is in a language other than English, a translated copy of the financial statement in English is also to be

placed on the website.

- Secretarial Compliance Report.
- Disclosure of the policy for determination of materiality of events or information.
- Disclosure of contact details of Key Managerial Personnel who are authorized for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchanges as required under under Regulation 30(5) of LODR Regulations.
- All such events or information which have been disclosed to the Stock Exchanges under Regulation 30(8) of LODR Regulations.
- Statement of deviation(s)/ variation(s) in use of proceeds from public issue, rights issue, preferential issue etc.
- Annual Return as provided under Section 92 of the Act and the rules made thereunder.
- Employee Benefit Scheme Documents, excluding commercial secrets and such other information that would affect competitive position of the Company, framed in terms of the provisions of SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021. For the purpose of this compliance, the Company may provide the exact link to the webpage of each of the recognized stock exchanges where such information has already been made available by the Company.

(B) The following information shall be uploaded on the website as soon as it is disclosed to Stock Exchanges and shall be archived after a period of five years:

- Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation/ merger/ demerger/restructuring), or sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the Company, sale of stake in associate company of the Company or any other restructuring.
- Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.
- New Rating(s) or revision in Rating(s).
- Outcome of Meetings of the Board of Directors held to consider:
  - Dividends recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched;
  - Any cancellation of dividend with reasons thereof;
  - Board Decision on Buyback of securities ;
  - Board Decision of fund raising proposed to be undertaken including by way of issue of securities (excluding security receipts, securitized debt instruments or money market instruments regulated by the Reserve Bank of India), through further public offer, rights issue, American Depository Receipts/ Global Depository Receipts/ Foreign Currency Convertible Bonds, qualified institutions placement, debt issue,

preferential issue or any other method;
- Increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched.
- Reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;
- Short particulars of any other alterations of capital, including calls;
- Financial results;
- Board decision on voluntary delisting from stock exchange(s).

- Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the Company), agreement(s)/treaty(ies)/contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.
- Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the Company or of its holding, subsidiary or associate company, among themselves or with the Company or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the Company or impose any restriction or create any liability upon the Company, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the Company is a party to such agreements.

  Provided that such agreements entered into by a listed entity in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or they are required to be disclosed in terms of any other provisions of these regulations.
- Fraud/defaults by the Company, its promoter, director, key managerial personnel, senior management or subsidiary arrest of key managerial personnel, senior management, promoter or director of the Company, whether incurred within India or abroad.
- Change in Directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), senior management, Auditor and Compliance Officer.
- In case of resignation of the auditor of the Company, detailed reasons for resignation of auditor, as given by the said auditor, shall be disclosed by the Company to the stock exchanges as soon as possible but not later than twenty four hours of receipt of such reasons from the auditor. In case of resignation of an independent director of the Company within seven days from the date of resignation, the following disclosures shall be made to the stock exchanges by the Company:

i. The letter of resignation along with detailed reasons for the resignation as given by the said director;
ii. Names of listed entities in which the resigning director holds directorships, indicating the category of directorship and membership of board committees, if any;
iii. The independent director shall, along with the detailed reasons, also provide a confirmation that there is no other material reasons other than those provided; and
iv. The confirmation as provided by the independent director above shall also be disclosed by the Company to the stock exchanges along with the disclosures as specified in sub-clauses (i) and (ii) above.

- In case of resignation of key managerial personnel, senior management, compliance officer or director other than an independent director; the letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director shall be disclosed to the stock exchanges by the Company within seven days from the date that such resignation comes into effect.
- In case the Managing Director or Chief Executive Officer of the Company was indisposed or unavailable to fulfil the requirements of the role in a regular manner for more than forty five days in any rolling period of ninety days, the same along with the reasons for such indisposition or unavailability, shall be disclosed to the stock exchange(s).
- Appointment or discontinuation of share transfer agent.
- Resolution plan/ Restructuring in relation to loans/borrowings from banks/financial institutions including the following details:
  (i) Decision to initiate resolution of loans/borrowings;
  (ii) Signing of Inter-Creditors Agreement (ICA) by lenders;
  (iii) Finalization of Resolution Plan;
  (iv) Implementation of Resolution Plan;
  (v) Salient features, not involving commercial secrets, of the resolution/ restructuring plan as decided by lenders.
- One time settlement with a bank.
- Winding-up petition filed by any party / creditors.
- Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the Company.
- Proceedings of Annual and extraordinary general meetings of the Company.
- Amendments to memorandum and articles of association of Company, in brief.
- Schedule of analysts or institutional investors meet at least two working days in advance (excluding the date of the intimation and the date of the meet) and presentations prepared by the Company for Analyst or institutional investor meet, post earnings or quarterly calls shall be disclosed to the recognized stock exchanges prior to beginning of such events.
- Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through

digital means, in the following manner:
(i) The audio recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier;
(ii) the video recordings, if any, shall be made available on the website within forty-eight hours from the conclusion of such calls;
(iii) the transcripts of such calls shall be made available on the website along with simultaneous submission to recognized stock exchanges within five working days of the conclusion of such calls.

- The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code:
  a) Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default;
  b) Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default;
  c) Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable;
  d) Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code;
  e) List of creditors as required to be displayed by the corporate debtor under regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;
  f) Appointment/ Replacement of the Resolution Professional;
  g) Prior or post-facto intimation of the meetings of Committee of Creditors;
  h) Brief particulars of invitation of resolution plans under Section 25(2)(h) of Insolvency Code in the Form specified under regulation 36A(5) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;
  i) Number of resolution plans received by Resolution Professional;
  j) Filing of resolution plan with the Tribunal;
  k) Approval of resolution plan by the Tribunal or rejection, if applicable;
  l) Specific features and details of the resolution plan as approved by the Adjudicating Authority under the Insolvency Code, not involving commercial secrets, including details such as:
  (i) Pre and Post net-worth of the company;
  (ii) Details of assets of the company post CIRP;
  (iii) Details of securities continuing to be imposed on the companies' assets;
  (iv) Other material liabilities imposed on the company;
  (v) Detailed pre and post shareholding pattern assuming 100% conversion of convertible securities;
  (vi) Details of funds infused in the company, creditors paid-off;
  (vii) Additional liability on the incoming investors due to the transaction, source of such funding etc.;
  (viii) Impact on the investor – revised P/E, RONW ratios etc.;
  (ix) Names of the new promoters, key managerial personnel, if any and their past experience in the business or employment. In case where promoters are companies, history of such company and names of natural persons in control;

(x) Brief description of business strategy.
m) Any other material information not involving commercial secrets.
n) Proposed steps to be taken by the incoming investor/acquirer for achieving the MPS;
o) Quarterly disclosure of the status of achieving the MPS;
p) The details as to the delisting plans, if any approved in the resolution plan.

- Initiation of Forensic audit: In case of initiation of forensic audit, by whatever name called, the following disclosures shall be made to the stock exchanges by the Company:
  a) The fact of initiation of forensic audit along-with name of entity initiating the audit and reasons for the same, if available;
  b) Final forensic audit report (other than for forensic audit initiated by regulatory / enforcement agencies) on receipt by the Company along with comments of the management, if any.
- Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of a Company, in relation to any event or information which is material for the Company in terms of regulation 30 of these regulations and is not already made available in the public domain by the Company.
- Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the Company or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the Company, in respect of the following:
  (a) search or seizure; or
  (b) re-opening of accounts under section 130 of the Companies Act, 2013; or
  (c) investigation under the provisions of Chapter XIV of the Companies Act, 2013; along with the following details pertaining to the actions(s) initiated, taken or orders passed:
  i. name of the authority;
  ii. nature and details of the action(s) taken, initiated or order(s) passed;
  iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;
  iv. details of the violation(s)/contravention(s) committed or alleged to be committed;
  v. impact on financial, operation or other activities of the Company, quantifiable in monetary terms to the extent possible.
- Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, in respect of the following:
  (a) suspension;
  (b) imposition of fine or penalty;
  (c) settlement of proceedings;
  (d) debarment;
  (e) disqualification;

(f) closure of operations;
(g) sanctions imposed;
(h) warning or caution; or
(i) any other similar action(s) by whatever name called;
along with the following details pertaining to the actions(s) taken or orders passed:
i. name of the authority;
ii. nature and details of the action(s) taken or order(s) passed;
iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;
iv. details of the violation(s)/contravention(s) committed or alleged to be committed;
v. impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.

- Voluntary revision of financial statements or the report of the board of directors of the Company under section 131 of the Companies Act, 2013.
- Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
- Any of the following events pertaining to the Company:
  (a) arrangements for strategic, technical, manufacturing, or marketing tie-up; or
  (b) adoption of new line(s) of business; or
  (c) closure of operation of any unit, division or subsidiary (in entirety or in piecemeal).
- Capacity addition or product launch.
- Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/ contracts not in the normal course of business.
- Agreements (viz. loan agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
- Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
- Effect(s) arising out of change in the regulatory framework applicable to the Company.
- Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the Company.
- Frauds/defaultsby employees of the Company which has or may have an impact on the Company.
- Options to purchase securities including any ESOP/ESPS Scheme.
- Giving of guarantees or indemnity or becoming a surety, by whatever name called, for any third party.
- Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
- Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority.

- Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.
- Any other disclosures of event/information as specified by the Board from time to time.

8. REVIEW

This policy shall be reviewed from time to time so that the policy remains complaint with applicable legal requirements. The Company Secretary shall take the requisite steps to keep the Policy updated as per applicable Statutory guidelines with the approval of the Board.

9. DISCLOSURES

The policy shall be continuously hosted on the website of the Company with updates as and when made.

Sd/-
(Urvashi Tilakdhar)
Dated: 24.12.2025 Senior Managing Director

Note: The policy shall be continuously hosted on the website of the Company with updates as and when made.