DCM SHRIRAM FINE CHEMICALS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

(Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

(Approved by 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 preservation of documents pursuant to SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 which came into effect from 24.12.2025, in its meeting held on 24.12.2025.

2. SCOPE

This Policy shall govern the maintenance and preservation of statutory documents which are required to be maintained by the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Companies Act, 2013, and SEBI Act, 1992. Other documents as may be required to be maintained be maintained according to requirements of applicable laws and/ or discretion of the management.

3. APPLICABILITY

This Policy will be applicable to all Offices, Sections, Divisions and Units of the Company which are required to maintain documents / records pertaining to the above Statutes.

4. OBJECTIVES OF THE POLICY

The main objective of this Policy is to ensure that all the statutory documents maintained under the above Statutes are preserved in compliance with the requirements of the said Statutes and Rules, Regulations and Guidelines under the above Statutes according to this Policy.

The major objectives of the policy are:

a) Identification of Statutory Registers and other records of the Company which are required to be preserved.
b) Identification and categorization of the Statutory Registers and other records to be maintained either for not less than eight years or permanently.

c) Decide whether the Statutory Records and documents are to be preserved in physical form or in electronic form.
d) Disposal of Statutory documents after the expiry of the required period.

5. DEFINITIONS

- 'Act' means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;

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

- 'Company', 'This Company', 'The Company', 'Company', 'Listed Entity', wherever occur in the policy shall mean "DCM Shriram Fine Chemicals Limited".

- 'Compliance Officer' shall mean the Company Secretary or any other person appointed as such by the Board from time to time.

- 'Electronic Form' means any contemporaneous 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.

- 'LODR Regulations` means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

- 'Maintenance' means keeping Documents, either physically or in Electronic Form.

- 'Policy' or 'This Policy' means, 'Policy on Preservation of Documents.'

- 'Preservation' means to keep in good order and to prevent from being altered, damaged or destroyed after its creation.

6. INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, SEBI Act, LODR Regulations and/ or any other Rules, Regulations or Guidelines under any other applicable Statutes.

7. GUIDELINES

Regulation 9 of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015, provides that the listed entity

shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows:

i. documents whose preservation shall be permanent in nature;
ii. documents with preservation period of not less than eight years after completion of the relevant transactions:

Accordingly, the preservation of documents shall be done in the following manner:

a) Where a period for preservation of documents is laid down under any Statute, the Company will adhere to that period and dispose off the documents on expiration of the period following due process.
b) Where there is no such requirement as per Applicable Law, the related documents will be preserved for such period of time as the matter to which the document pertains is "current" and thereafter disposed off following the due process.
c) In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with it takes a considered view about its relevance.

An indicative list of the documents and the time-frame of their preservation is provided in Annexure- I.

Modes of preservation

The Documents may be preserved in:

a) Physical form or
b) Electronic Form.

The officials of the Company required to preserve the documents shall be an Authorized Person of appropriate level, who is required to ensure compliance of requirements of the respective applicable laws.

The preservation of documents should be such as to ensure that there is no unauthorized tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents after the creation thereof.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorized Person for preservation, so as to ensure integrity of the documents and prohibit unauthorized access.

Destruction of Documents

Destruction as a normal administrative practice usually occurs because of efflux of time or the records are no longer of use. This applies to both Physical and Electronic documents.

The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the documents are stored, after the prior approval of the Head of the Department/ Unit/ Board or any other authority as required under the Applicable Laws pursuant to which the documents have been preserved.

A register of the documents disposed/destroyed shall also be maintained by the Authorized person. It shall state the brief particulars of the documents destroyed, date of disposal/ destruction and the mode of destruction.

The entries in the Register shall be authenticated by the Authorized Person.

8. REVIEW

This Policy shall be reviewed from time to time so that the policy remains compliant 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.

Sd/-
(Urvashi Tilakdhar)
Senior Managing Director

Dated: 24.12.2025

DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

Annexure – I

INDICATIVE LIST

A. PERMANENT PRESERVATION

- The Memorandum and Articles of the Company.
- Affidavit from the subscribers to the memorandum and from persons named as the first directors
- Register of Members
- Register of Charges
- Books and Documents relating to the issue of share certificates, including the blank forms of share certificates
- The Foreign Register of Members
- Minutes Book of General meetings
- Minutes of Board meeting and Committee meetings
- Register of Contracts and Arrangement in which Directors are interested
- Register of Inter Corporate Loan & Investments

B. TEMPORARY PRESERVATION

- Register of Debenture-holders or any other security-holders (8 years from the date of redemption of Debentures or Securities)
- Copies of all Annual Returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and documents required to be annexed thereto (8 years from date of filing with the Registrar)
- Foreign Register of Debenture-holders or any other security-holders (8 years from the date of Redemption)
- All notices pertaining to disclosure of interest of directors
- All certificates surrendered to the Company (3 years from date of surrender)

- Register of Deposits (not less than 8 years from the date of last entry)
- Instrument creating a charge or modification (8 years from date of satisfaction of charge)
- Books of Accounts, Financial Statements, etc (8 years from the last of financial year)
- Office copies of Notices/ Agenda, Scrutiniser's Report and related papers (as long as they remain current or for 8 financial years), whichever is later.

C. SPECIMEN FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED OFF/ DESTROYED

Date and mode of destruction	Relevant provision of applicable law	Particulars of document	Initials of the authorized person