

TRIOCHEM PRODUCTS LIMITED

MANUFACTURERS OF ETHICAL PHARMACEUTICAL PRODUCTS



Regd. Office : 4th Floor, Sambava Chambers, Sir P. M. Road, Fort, Mumbai - 400 001.
Tel. : 00 91 (22) 4082 8100 | Fax : 00 91 (22) 4082 8181 | E-mail : info@amphray.com
Corporate Identity Number : L24249MH1972PLC015544

POLICY FOR PRESERVATION AND ARCHIVING OF DOCUMENTS

1. BACKGROUND

The Securities and Exchange Board of India ("SEBI") vide its Notification dated September 2, 2015 issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Listing Regulations come into force from December 1, 2015. The Listing Regulations mandate listed entities to formulate a Policy for preservation and archiving of documents. It is in this context that the Document Retention and Archival Policy ("Policy") is being framed and implemented.

Regulation 9 of the Listing Regulations requires every listed entity to have a policy for preservation of documents approved by its Board of Directors.

2. EFFECTIVE DATE

This Policy shall be effective from December 1, 2015.

3. OBJECTIVE OF THE POLICY

The objective of this Policy is to classify the documents in two categories

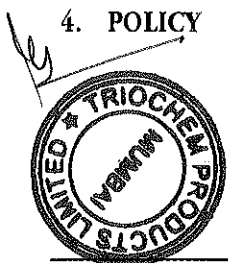
3.1. Documents which need to be preserved permanently and

3.2. Documents which need to be preserved for a specific period of time.

The objective of this Policy is to integrate, harmonise and standardize the procedure and manner for preservation and destruction of documents which are required to be prepared or maintained under the SEBI Laws and the Act.

This Policy contains guidelines to identify documents that are required to be maintained and the period for which those documents should be retained.

4. POLICY



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The corporate records of Triochem Products Limited (the "Company") are important assets. Corporate records include essentially all records, whether paper or in electronic form. A record may be in the form of a memorandum, an e-mail, a contract or case study and includes computerized desk calendar, an appointment book or an expense record etc.

The law requires the Company to maintain certain types of corporate records either permanently or for a specified period of time. Failure to retain the records could subject the employees and the Company to penalties and fines, cause the loss of rights, obstruct justice, adversely impact potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

The Company expects all employees to fully comply with this Policy, provided that all employees should note the following general exception to any stated destruction schedule:

If an employee has reason to believe, or the Company informs the employee concerned, that Company records are relevant to litigation or potential litigation (i.e., a dispute that could result in litigation), then the employee must preserve those records until the Legal or Respective Department determines that the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records. If an employee(s) believe that exception may apply or has any question regarding the possible applicability of that exception, he / she may contact the Office the of Compliance Officer.

The Company, from time to time establishes retention or destruction policies or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property. While minimum retention periods are suggested, the retention of the documents identified in those schedules and of documents not included in the identified categories should be determined by the Head of the Department, primarily by the application of the general guidelines affecting

document retention identified above, as well as any other pertinent factors.

Basically, there are two kinds of Company records - Temporary and Retained.



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4.1. Temporary Records

4.1.1. Temporary records include all business documents that are intended to be superseded by final or permanent records, or which are intended to be used only for a limited period of time, including, but not limited to written memoranda and dictation to be typed in the future, reminders, to-do lists, reports, drafts, and interoffice correspondence regarding a client or business transaction.

4.1.2. Temporary records can be destroyed or permanently deleted if in electronic form when a project or matter closes.

4.1.3. Upon closing of such temporary files, the respective departments shall gather and review all such temporary records. Before destroying or deleting these documents make sure to have duplicates of all the final records pertaining to the project or matter. Upon destruction or deletion, organize the final records (and duplicate) in a file marked "Final" and store them appropriately, as required under this Policy.

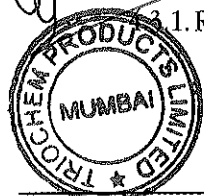
4.2. Retained Records

Retained records include all business documents that are not superseded by modification or addition, including but are not limited to documents given (or sent via electronic form) to any third party not employed by the Company, or to any government agency; final memoranda and reports; correspondence; handwritten telephone memoranda not further transcribed; minutes; specifications; journal entries; cost estimates; etc.

4.3. Record Retention Schedule

Each Head of the Department shall identify and at all times maintain a schedule of temporary and retained documents.

4.3.1. Records as per the Companies Act, 2013 and SEBI Regulations.



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The Company shall maintain all records as per the Companies Act, 2013 and SEBI Regulations for not less than 8 (Eight) Years. Documents that are to be made available on the Company's website in Compliance with SEBI (Listing Regulations and Disclosure Obligations), 2015 will be made available on the website for a period of 5 (Five) years and thereafter will be archived for a period of 3 (Three) years.

4.3.2. Tax Records

Tax records includes, but are not limited to Documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax Authorities. Tax Records shall be maintained for a period of 8 (Eight) Years or for a period of 8 (Eight) Years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be.

4.3.3. Employment / Personnel Record

The Company is required to keep certain documents relating to recruitment, employment and personnel information, performance review, action taken by or against any employee, complaints by or against any employee. These Documents relating to Employment or Personnel information shall be retained for a period of at least 8 (Eight) years.

4.3.4. Legal Documents

Legal Documents shall include, but shall not be limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters.

A contract shall be retained for a period of 8 (Eight) Years or for 8 (Eight) Years after the expiry of the term of the contract, whichever is higher.



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Documents relating to any property owned by the Company shall be retained perpetually. Other property Documents shall be retained for a period of 8 (Eight) Years or for a period of 8 (Eight) Years after the rights in such property ceases to exist, whichever is higher.

Orders passed by any Court or Tribunal or any Authority or Judgment which are final in natural and cannot be superseded shall be retained permanently. Interim Orders shall be retained till a Final Order is received or for a period of 8 (Eight) Years whichever is higher.

Pleadings shall be retained for a period of 8 (Eight) Years or till the matter has been disposed off, whichever is higher.

4.3.5. Marketing and Sales Documents

The Company shall retain relevant marketing and sales Documents for a period of at least 8 (Eight) Years.

4.3.6. Intellectual Property Documents and Licenses

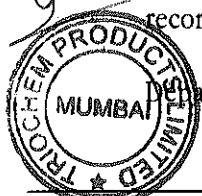
Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.

Licenses shall be retained till the time validity of the License and for a period of 8 (Eight) Years thereafter or for a period of at least 8 (Eight) Years, whichever is higher.

4.4. Record Maintenance and Storage

All records in physical form are to be maintained by the Records / Respective Department(s) at the respective locations.

Electronic version(s) of all records are to be maintained within the Company's centralized electronic record software database, which is maintained by the IT (Information and Technology) Services Department.



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4.5. Disposal of Records

Physical records disposal of pursuant to the retention periods specified in the Document Retention Schedule shall be disposal of using a cross-cut shredder. The Records Department shall adopt appropriate procedures to permanently dispose of any non-paper physical records, such as photographs or audio / video recordings.

In the event that it is necessary to manually dispose of an electronic record, the IT Department shall use the "permanent delete" function to permanently disclose of electronic records.

4.6. Hold on Records Destruction and Deletion

If a lawsuit or other proceeding involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, must cease immediately. Documents relating to the lawsuit or potential legal issue will then be retained and organized under the supervision of the Office of the Compliance Officer's.

Violation of this aspect of the Company's Document Retention Policy could subject the Company and the employees involved to civil and criminal penalties.

In the event of a Document Hold Direction, the IT (Information and Technology) Department shall immediately disable the "permanent delete" and "automatic delete" functions of the Company's software with respect to the designated records and disable the automatic deletion of recycle bins and deleted items folders on appropriate Company computers; the Records Department shall immediately suspend all disposition of records maintained on-site of off-site location as appropriate; and the office of the Compliance Officer's shall immediately notify all appropriate employees by e-mail that they are not to dispose of relevant Temporary Records or other records until notified otherwise.

E-mail Policies



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All electronic communication systems as well as communications and stored information transmitted, received or contained on the Company's information systems are the property of the Company. Employees using this equipment for personal purposes do so at their own risk. Employees have no expectation of privacy in connection with the use of Company equipment or with the transmission, receipt, or storage of information using the Company's equipment. Authorized Company personnel may access communications and stored information at any time without notice or consent.

Employees should avoid using Company e-mail for personnel purposes. Personnel e-mails should be deleted as soon as possible.

E-mails relating to audit work papers and financial controls should be retained for at least 8 (Eight) years.

All emails to the Company's Officers or Audit Committee relating to complaints on auditing, accounting, frauds or internal controls should be retained permanently.

Any messages exchanged between the Company and third parties (such as consultants and auditors) should be archived of their content. Instant messages have the same status as e-mails and should be treated identically.

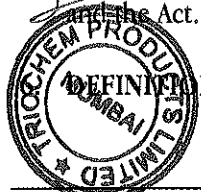
4.8. Compliance

Failure to comply with this Document Retention Policy may result in disciplinary action. Questions about this policy should be referred to the Office of the Compliance Officer, who is in charge of administering, enforcing and updating this policy.

5. PROCEDURE FOR RECORDS AS PER THE COMPANIES ACT, 2013 AND SEBI REGULATIONS.

All documents shall be maintained in good order and as far as feasible under lock and key. If authorized by the Board, documents may also be maintained in electronic form, subject to the provisions of the SEBI laws

and the Act.



DEFINITIONS AND INTERPRETATIONS

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6.1. 'Act' shall mean the Companies Act, 2013 as amended from time to time and shall include Rules, Regulations and Secretarial Standards made there under or pursuant thereto.

6.2. 'Board' shall mean Board of Directors of the Company.

6.3. 'Company' shall mean Triochem Products Limited.

6.4. 'Company Secretary' shall mean the person appointed as the Company Secretary of the Company in terms of the Act.

6.5. 'Documents' shall include Minutes, Returns, Registers, Books, Forms etc. required to be filed and maintained under the Act or under SEBI laws.

6.6. 'Registered Office' shall mean the Registered Office of the Company, within the meaning of Section 12 of the Act.

6.7. 'SEBI Laws' shall include

6.7.1. SEBI Act, 1992

6.7.2. Securities and Contract (Regulation) Act, 1956

6.7.3. Depository Act, 1996

6.7.4. SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

6.7.5. SEBI (Prohibition of Insider Trading) Regulations, 2015

6.7.6. SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

6.7.7. SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009

6.7.8. SEBI (Investor Protection and Education Fund) Regulations, 2009

6.7.9. SEBI (Buy Back of Securities) Regulations, 1998

6.7.10. SEBI (Depositories and Participants) Regulations 1996

6.7.11. SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

And all other and regulations made by SEBI from time to time



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All words and expressions used but not defined in this Policy, but defined in the Act or the Listing Regulations shall have the same meaning as respectively assigned to them in such Act Regulations, as the case may be.

Words importing the singular number shall include the plural number and words importing the masculine gender shall, where the context admits, include the feminine and neuter gender.

7. CUSTODY

7.1. Following documents / registers / books shall be kept in the custody of the Company Secretary /

Compliance Officer:

7.1.1. Minutes Books;

7.1.2. Register of Members along with the index;

7.1.3. Foreign Register of Members;

7.1.4. Register of Debenture Holders or any other security holders along with the index;

7.1.5. Foreign Register of Debenture Holders or any other security holders;

7.1.6. Notices received in Form MBP-1;

7.1.7. Register of loan, guarantee, security and acquisition (MBP-2);

7.1.8. Register of investments in shares or other securities beneficially held by the company but which are not held in its own name (MBP-3);

7.1.9. Register of Deposit;

7.1.10. Register of contracts or arrangements in which directors are interested (MBP-4);

7.1.11. Register of Renewed and Duplicate Share Certificates (SH-2).

7.1.12. Register of Charges (CHG-7);

7.1.13. Register of Directors Attendance in Board Meeting And Committee meetings;

7.1.14. Register of Directors and KMP (Section 170)



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- 7.1.15. Register of Employee Stock Option (SH-6);
- 7.1.16. Register of Buy back of securities (SH-10);
- 7.1.17. All books and documents relating to the issue of share certificates in case of disputed cases;
- 7.1.18. Register of Transfer;
- 7.1.19. Register of Records and Documents destroyed;
- 7.1.20. Such other registers/records as are required to be maintained under the Act.

The Board may, however, authorize any other person / director for this purpose.

7.2. Postal ballots and all other papers relating to postal ballot including voting by electronic means, upon receipt from the scrutinizer shall be kept in the custody of the Company Secretary or such other persons as may be authorised in this behalf by the Board.

7.3. The Company Secretary shall be responsible for the maintenance, preservation and safe custody of all books and documents relating to the issue of share certificates, including the blank forms of shares certificates.

7.4. All document, papers, returns and correspondences required to be maintained under the SEBI Laws shall be kept in the custody of the Company Secretary or any other person authorised by the Board of this purpose.

8. PERIOD AND PLACE OF PRESERVATION

8.1. The following Registers / documents shall be kept permanently:

8.1.1. Minutes of all Meetings. In case of merger or amalgamation, Minutes of all Meetings of the transferor company, as handed over to the Company;

8.1.2. Register of Members (MGT-1) along with the index;

8.1.3. Foreign register of Members, if any unless it is discontinued and all the entries are transferred to any other foreign register or to the principal register;



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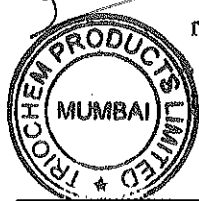
- 8.1.4. Register of Loan, Guarantee, Security and Acquisition (MBP-2);
- 8.1.5. Register of investments in shares or other securities beneficially held by the company but which are not held in its own name (MBP-3);
- 8.1.6. Register of Contracts of Arrangements in which directors are interested (MBP-4);
- 8.1.7. Register of Renewal and Duplicate Share Certificates(SH-2);
- 8.1.8. All books and documents relating to the issue of share certificates in case of disputed cases;
- 8.1.9. Register of Charges (CHG-7);
- 8.1.10. Register of Directors Attendance in Board Meeting and Committee meetings;
- 8.1.11. Register of Directors and KMP (Section 170)
- 8.1.12. Register of Transfer;
- 8.1.13. Register of Records and Documents destroyed;
- 8.1.14. Statutory Audit Reports and Annual Financial Statements.

The Minute Books of general meetings and registers mentioned in Serial No.: 8.1.1, 8.1.4, 8.1.5, 8.1.6, 8.1.7, 8.1.9 and 8.1.14 shall be kept at the Registered Office. The Minutes Books of the board including committee meetings and registers mentioned in Serial No. 8.1.2, 8.1.3, 8.1.8, 8.1.10, 8.1.11, 8.1.12 and 8.1.13 shall be kept at the Registered Office or such other place as the Board shall decide in compliance with the Act and the Articles of Association of the Company.

8.2. The following Registers/documents shall be kept for a minimum period of 8 (Eight) years:

8.2.1. Offices copies of Notices, Agenda, Notes on Agenda, scrutinizer's register, scrutinizer's report and other related papers;

8.2.2. In case of merger or amalgamation, office copies of Notices, Agenda, Notes on Agenda, scrutinizer's register, scrutinizer's report and other related papers of the transferor company, as handed over to the Company;



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- 8.2.3. Register of debenture holders or any other security holders (MGT-2) along with the index from the date of redemption of debentures or securities;
- 8.2.4. Foreign register of debenture holder's or any other security holders, if any from the date of redemption of such debentures or securities;
- 8.2.5. Copies of all annual return and copies of all certificates and documents required to be annexed thereto - from the date of filing with the Registrar, (Section 92 of the Act);
- 8.2.6. Registrar of deposit from the financial year in which the latest entry is made in the register;
- 8.2.7. Books of account together with the vouchers relevant to any entry in such books of accounts from the end of the financial years to which it relates;
- 8.2.8. Notices received in Form MBP-1 from the end of the financial year to which it relates.
- 8.2.9. Register of Employee Stock Option (SH-6)
- 8.2.10. Register of Buy back of securities (SH-10)
- 8.2.11. Register of Proxies.

The document mentioned in Serial No. 8.2.1 to 8.2.6 and 8.2.9 to 8.2.11 shall be kept at the Registered Office or such other place as the Board shall decide in compliance with the Act and the Articles of Association of the Company. The documents mentioned in Serial No. 8.2.7 and 8.2.8 shall be kept at the registered office of the Company.

Documents under Clause 8.2.1 and 8.2.2 shall be preserved after the minimum period of 8 (Eight) years, if they remain current.

Registers / Record required to be maintained under the Act, but not expressly mentioned here, shall be maintained for a minimum period of 8 (Eight) years.

Documents relating to incorporation



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The Company shall maintain and preserve at its Registered Office, copies of all documents and information as originally filed under the previous Companies Act, 1956 as far as possible, till its dissolution under the Act.

8.4. Postal ballot and all other related papers

The postal ballot and all other papers relating to postal ballot including voting by electronic means shall be preserved for such period as prescribed under the Act.

8.5. Maintenance of share certificate forms and related books and documents

All books and documents relating to the issue of share certificates, including the blank forms of shares certificate shall be preserved in good order for not less than thirty years. All certificates surrendered to the Company shall immediately be defaced and be kept for a minimum period of three years from the date on which they are surrendered. However, this will not apply to cancellation of certificates of securities under section 6(2) of the Depositories Act, 1996.

8.6. Paid dividend warrants

The paid dividend warrants, where returned to the Company by the Bank through whom dividend was paid, shall be kept for a period of 10 (Ten) years after payment of the same by the Bank or for such other period as may be agreed to between the Company and the Bank.

8.7. Documents and returns under the various SEBI laws

The Documents, papers, returns and correspondences required to be submitted maintained under the various SEBI laws shall be preserved for such period as mentioned in respective SEBI laws or if no period is prescribed, for a minimum period of 8 (Eight) years.

The documents mentioned in clause 8.3 to 8.7 shall be kept at the Registered Office or such other

place as the Board may decide in compliance with the Act, SEBI laws and the Articles of Association of the



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9. DISPOSAL OF REGISTERS / DOCUMENTS

The registers / documents mentioned in Clause 8.2 to 8.7 may be destroyed in accordance with the provisions contained in the Act and the SEBI laws after approval with the Board and in presence of at least one Company Secretary in Practice or Chartered Accountant in Practice or Advocate. However, documents contained in Serial No. 8.2.2 of Clause 8.2 shall be destroyed only after permission of the Central Government.

The Board shall review at least once in every two years, the list of documents that may be destroyed.

The Company shall maintain a Register of Records and Documents Destroyed containing the particulars of documents destroyed, the year to which it pertains, mode of destruction, etc. Each entry in this register shall be verified by the Company Secretary, Compliance Officer and countersigned by the Company Secretary in Practice or Chartered Accountant in Practice or Advocate.

The concerned employee shall be responsible for taking into account the potential impact on preservation / destruction of the documents in their work area and their decision to retain / preserve / destroy documents pertaining to their area of work.

10. EXCLUSION

Documents / records in respect of which any investigation / enquiry is pending or in respect of which any legal proceeding is pending or which is part of any legal dispute are not covered under this policy.

11. REVIEW

This policy has been approved by the Board of Directors of the Company. The Board, however, may review this Policy as and when it deems appropriate. This Policy is being formulated keeping in mind the applicable laws, rules, regulations and standards in India. If there is an amendment in such laws, rules, regulations and standards, allowing or relaxing what was previously not allowed under any laws, rule, regulation and standards, then this Policy shall be deemed to have been amended to the extent of such amendment. Also, if



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due to subsequent amendment in the laws, this Policy or any part hereof becomes inconsistent with the law,
the provisions of law shall prevail and this Policy shall be deemed to be amended to that extent.

12. COMPLIANCE

Failure to comply with this Document Retention Policy may result in disciplinary action. Questions about this policy should be referred to the Office of the Compliance Officer, who is in charge of administering, enforcing and updating this policy.



For Triochem Products Limited


Ramu S. Deora
(Director)

DIRECTOR & CEO

DIN: 00312369