

# **BASF India Limited**

## **Record Management Policy**

The Securities and Exchange Board of India (SEBI) under SEBI (listing Obligations and Disclosure requirements) Regulations, 2015 mandates every listed Company to have a policy for preservation of documents, approved by its Board of Directors, classifying them in atleast two categories as follows:

- (a) Documents whose preservation shall be permanent in nature;
- (b) Documents with preservation period of not less than eight years after completion of the relevant transactions:

Provided that the Listed entity may keep documents specified in clause (a) and (b) in electronic mode.

Accordingly the Company adopts the following policy for preservation of its records, including proper retention and disposal of Records consistence with legal, tax, auditing and business requirements.

Records shall mean any combination of words, numbers, graphics or symbols pertaining to the Company, created to convey information either in paper, electronic or other format.

### **Framework**

As per the Companies Act, 2013 and Rules made thereunder, all the registers and other documents as required to be retained should be preserved at such place and for the period as may be prescribed under the Act or any amendments made from time to time and should be kept in the custody of the Company Secretary of the Company or any other person authorized by the Board for the purpose.

Documents pertaining to finance, Income Tax, Service Tax, Sales Tax or under any other law /Act shall be retained for such period as may be required under the specific law / Act or as may be decided by the respective Functional Head.

Documents pertaining to Intellectual Property shall be retained for such period as may be required under the BASF Global IP guidelines.

Records that are ineligible for destruction and are to be retained indefinitely will be decided by the respective Business / Functional Head.

Emails, back-ups and other media related documents shall be retained in accordance with the BASF IT Policy.

### **Manner of retention**

Records retention must be in such a manner that it must be identifiable and retrieved at a later date with least complexities. Proper retention helps to support accountability and also demonstrate compliance.

### **Disposal of retained documents**

All retained records shall be kept till the prescribed time period and shall be thereafter destroyed at the expiration of such period, unless they are required to be retained permanently.

Statutory documents should be destroyed only after seeking the approval of the Board of Directors of BASF India Limited or any Committee thereof.

### **Policy Review**

The Policy shall be subject to review from time to time as may be deemed necessary and in accordance with any regulatory amendments / requirements. The Managing Director is authorised to make suitable amendments to the Policy on behalf of the Company.