

ARCHIVAL POLICY

Introduction:

Aether Industries Limited (referred to as 'Company') is mainly engaged in business of manufacturing basic cum specialty chemicals along with research and development activities.

Company values integrity, commitment, standards and ethics and also believes that such principles and standards govern the behavior of the Company and its' employees. High moral and ethics are always essential for long term achievements and vision of the Company.

Preamble:

The purpose of this document is to present a Policy of the Company regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR").

There are several documents and records in any format, by whatever name it may be called, which are the significant and material one in nature, required to be maintained preserved.

To identify such documents and records to be preserved and archived, the Policy is formed.

This Policy involves the systematic identification, categorization, maintenance, review, retention, and destruction of documents received or created in the course of business and also, how the documents and when the documents should be disposed of when no longer required, how should be accessed and retrieved as and when required.

Purpose

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

Statutory requirement:

This Policy shall observe and comply with the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended.

As per Regulation 9 of the Regulations, every listed company is required to have a policy for preservation of documents approved by its Board of Directors, classifying them as documents whose preservation shall be permanent in nature and documents with preservation period of not less than eight years after completion of relevant transactions.

The Policy is approved by the Board and reserves the right to amend from time to time as and when required.

Policy

a) Legislative Framework and Standards

- Companies Act, 2013.
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

b) Maintenance of Records

- The content and essential characteristics of digital records must remain unchanged through preservation.
- Digital records can be maintained in forms such as emails, web pages or database records, plus scanned versions of paper records that have been digitised in business processes.
- Physical records to be maintained in books and files and shall be duly numbered along with month and year clearly marked therein on the books and files.
- All digital and physical records to be saved at the registered / administrative office of the Company and no physical records can be migrated without permission of Company Secretary/Directors/Authorised persons.
- A record of all physical records migrated from the registered office/administrative office of the company shall be duly entered into a register/electronic record along with the signatures of the person to whom the documents had been handed over and the Company Secretary / Directors / Authorised persons
- A reproduction of any original record on microfilm or on any other medium shall be certified by a Director or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.

c) Disposal and Destruction of Records

- All records mentioned in Annexure A which are temporary in nature must be preserved for not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed.
- All records mentioned in Annexure B need to be preserved by the Company permanently during the entire life of the Company.
- The Company shall store all events or information which has been disclosed to stock exchange(s) under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and which shall be hosted on the website of the Company for a minimum period of five years and thereafter the same shall be archived so as to be available for retrieval for such period as may be decided by the Managing Director of the Company.

- Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.
- The Company shall maintain a register as specified in Annexure C, wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.

Documents to be preserved for permanently:

Notwithstanding anything contained in the SS-1 and SS-2, below documents shall be maintained and preserved permanently:

- Annual Returns
- Financial Statements
- Minutes of the Members' and Board Meetings
- Disclosure made under various provisions to the Stock-Exchange from time to time
- Agreements with Shareholders
- Letter of Offer
- Any other document which the Board may think fit and necessary

Documents to be preserved for not less than eight years:

- Various notices / intimations amde by the Company to the Stock-Exchanges
- Book Closure and Record Keeping dates
- Quarterly, half-yearly and annual financial results
- Quarterly share-holding pattern
- Results of voting
- Document for any price-sensitive information
- Dividend particulars
- Complaints received and resolved by the Company
- Various Reports
- Any other document which the Board may think fit and necessary

Disposal of the documents:

Disposal of documents after said period of 8 (eight) years (whose preservation shall not be permanent in nature) shall be done in the presence of Authorized person in method prescribed by Board of Directors. Before disposing a soft copy shall be taken for the record.

Amendments:

The Board shall have the power to review and amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy as and when they feel required.

Review

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to necessary approval of the Board of Directors.

Sl. No.	Annexure A	Annexure B
1	Proxy Forms	Certificate of Incorporation
2	Representation Letters	Certificate of Change in Name (if any)
3	Annual Reports	Common Seal
4	Annual Returns	Memorandum and Articles of Association as amended from time to time
5	Consent and Resignation Letters received from the Directors/KMPs	Counter folios of Share Certificates issued from time to time
6	Board Agenda and supporting papers	Minutes Book (Board, Committee, General Meeting)
7	Office copies of Notices of General Meeting and related papers	Circular Resolutions and Certified Copies of Resolutions passed at board meetings
8	Quarterly and Annual Financial Statements (including Board Report and Auditors' Report)	Licenses and Permits
9	NSDL/CDSL Files	Statutory Registers
10	Declaration by Directors u/s 164 of the Companies Act, 2013	Scrutinizers' Report
11	Declaration by the Directors u/s 184 of the Companies Act, 2013	Register of Members
12	All documents under listing agreement, documents/communication with	Index of Members

Aether Industries Limited

Registered Office: Plot No. 8203, GIDC Sachin, Surat-394230, Gujarat, India.

Phone: +91-261-6603000 || **Email:** accounts@aether.co.in || **Web:** www.aether.co.in || **CIN:** U24100GJ2013PLC073434

Factory: Plot No. 8203, Beside Shakti Distillery, Near Rajkamal Chokdi, Road No. 8, Sachin GIDC, Sachin, Surat-394230, Gujarat, India.

	stock exchanges	
13	Notice of General Meeting and Board Meeting	Listing Agreement with Stock Exchanges
14	Documents on which common seal of the company is affixed	Central/State Government approvals received
15	Advertisements published	Any other Document / Information / Record as per the provisions of any other applicable Law or Regulation to the extent applicable to the Company
16	Disclosures under SEBI (Prevention of Insider Trading) Regulations, 2015 and SEBI (Substantial Acquisition of shares and Takeover) Regulations, 2011	

Annexure C

Sl. No.	Particulars of documents destroyed	Date and mode of destruction with the initials of Secretary or other authorised Person