

RECORDS AND ARCHIVES MANAGEMENT POLICY OF OMKAR SPECIALTY CHEMICALS LIMITED

1. PURPOSE

The Board of Directors (“Board”) of Omkar Specialty Chemicals Limited (“Company”), has adopted this Records and Archives Management Policy (“Policy”) to establish the framework required for effective preservation/ maintenance of documents and records of the Company required to be maintained under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

EFFECTIVE DATE

This Policy shall be effective from December 1, 2015.

2. OBJECTIVE

The objective of this Policy is to ensure that the documents / records pertaining to such events or information which has been disclosed to the stock exchanges and hosted on the Company’s website pursuant to the Listing Regulations (“Listing Records”), whether physically or in electronic form, are preserved for a minimum period of 5 (Five) years from the date of preparation of such Listing Records.

Further, if any, applicable law requires preservation of any of these Listing Records for longer period or permanently, then those shall be preserved / maintained accordingly.

3. POLICY FOR PRESERVATION / MAINTENANCE

The Listing Records created in physical form shall be scanned and maintained in electronic form as well. The electronic communication shall be maintained on the Company server in year wise folders.

Further, the safety of the Listing Records in electronic form is to be achieved as per the relevant IT policy of the Company whereas the physical records shall be in the custody of the Company Secretary.

The Listing Records shall be preserved for a minimum period of 5 (Five) years from the date of preparation of such Listing Records. However, if any, applicable law requires preservation of any of these Listing Records for longer period or permanently, then those shall be preserved / maintained accordingly.

4. PLACE OF PRESERVATION / MAINTENANCE

The Listing Records shall be preserved / maintained at the Corporate Office of the Company unless any other law requires it to be maintained at the Registered Office or any other place, in which case the same shall be kept at such place.

5. ACCESS / RETRIEVE

The Managing Director, Chief Financial Officer and the Company Secretary or any other person authorized by the Company Secretary, shall have access to the Listing Records.

6. ROLE OF REGISTRAR AND TRANSFER AGENT

The Registrar and Transfer Agent of the Company shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained with them. The Company shall obtain undertaking / confirmation from the Registrar and Transfer Agent of the Company in this regard, as and when required.

The Company Secretary may verify the Listing Records maintained by the Registrar and Transfer Agent, as and when required.

7. ARCHIVAL POLICY

The Company shall ensure that such information which is disclosed on the Company's website (www.omkarchemicals.com) as per the Listing Regulations must be hosted on the said website and in archive for a period of 5 years.

8. PERSON RESPONSIBLE

The Company Secretary shall be responsible for ensuring compliance under this Policy.

9. AMENDMENT

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s),

clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.
