

21 April 2016

To,
BSE Limited
Dept. DSC_CRD
Phiroze Jeejeebhoy Towers,
Dalal Street
Bandra (E)
Mumbai 400 001
Stock code No. **506222**

National Stock Exchange of India Limited
Exchange Plaza,
Plot No. C/1, 'G' Block,
Bandra- Kurla Complex,
Bandra (E)
Mumbai 400 051
Stock code. **INEOSSTYRO**

Subject: Approval of Policies under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

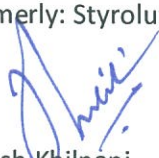
Dear Sir,

The Board of Directors of the Company have approved and adopted the following policies pursuant to the requirements of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 which are enclosed herewith and are also uploaded on the website of the Company.

1. POLICY FOR DETERMINING MATERIALITY FOR DISCLOSURES
2. DOCUMENT RETENTION AND ARCHIVAL POLICY

You are requested to kindly take on your records.

Thanking you.
Yours Faithfully,
For **INEOS Styrolution India Limited**
(Formerly: Styrolution ABS (India) Limited)


Haresh Khilnani
Company Secretary, Head – Legal & Compliance
Encl.: As stated above.

POLICY FOR DETERMINING MATERIALITY FOR DISCLOSURES

The Policy applies in respect of disclosure of material events occurring within INEOS Styrolution India Limited and its subsidiary.

1.0 Authorised Persons

The Company Secretary will be the custodian of the disclosure process. In the event of absence of the Company Secretary for any reason, his powers and functions shall be undertaken by a Key Managerial Personnel, as determined by the Chairman of the Board from time to time.

All questions about this Policy should be directed to the Company Secretary.

2.0 Materiality Assessment

Information should be regarded as “material” if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell, or hold a security or where the fact is likely to have a significant effect on the market price of the security. Materiality must be determined on a case to case basis depending on specific facts and circumstances relation to the information / event.

The criteria given hereunder shall be used as a guide or reference for determining materiality and arriving at the overall decision on reportability of the event by the Chairman of the Board and Key Managerial Personnel. Examples of information that would normally be regarded as “material” include the following, although the list is not exhaustive:

- Financial results, financial condition, projections or forecasts;
- Significant corporate events, such as pending or proposed acquisition or joint venture;
- Plans to launch new products;
- Events regarding the Company's securities; or
- Positive or negative developments in outstanding litigations, investigations or regulatory matters;

For the avoidance of doubt, events listed in Schedule III, Part A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be disclosed without application of the criteria listed below.

For the purpose of assessing whether a particular transaction or the amounts involved in that transaction are “material” the following information will also be considered, although the list is not exhaustive:

1. The consideration involved in the transaction as a percentage of SAI annual revenue;
2. The consideration involved in the transaction as a percentage of SAI total assets;
3. Whether the transaction is in the ordinary course of business;
4. Whether a related party is involved in the transaction;
5. Whether the transaction is an exit from, or entry into, a significant line of business.

DOCUMENT RETENTION AND ARCHIVAL POLICY

1. PREFACE:

Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (effective 1st December 2015), requires every Listed Company to formulate an Archival Policy. This policy deals with the retention and archival of the corporate records of INEOS Styrolution India Limited and its subsidiary (hereafter, the “Company”).

Corporate records are all paper or electronic records that are produced by you as an employee, including but not limited to, memoranda, contracts, e-mails, time sheets and expense records.

The Company is required to maintain certain types of corporate records for a specified period of time. Failure to do so could subject the Company and its employees to serious legal consequences.

All employees are expected to fully comply with this policy.

2. DEFINITIONS:

“Board of Directors” or “the Board” means the Board of Directors of INEOS Styrolution India Limited, as constituted from time to time.

“Company” means INEOS Styrolution India Limited.

“Listing Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“Policy” means this **Document retention and archival policy**.

“Material Events” means events as specified in Schedule III to the Listing Regulations from time to time upon occurrence of which the Company shall make disclosures to stock exchange(s) and host such disclosures on its website.

3. PURPOSE & SCOPE:

Pursuant to Regulation 30 of the Listing Regulations, the Company shall disclose on its website all such events or information which have been disclosed to stock exchange(s), and such disclosures shall be hosted and retained on the website of the Company.

4. POLICY:

The disclosure of material events shall be hosted and retained on the Company's website for a minimum period of 5(five) years. Thereafter depending upon the nature, materiality, impact and relevance of the material event, the disclosure of such material event can continue to remain hosted on the Company's website for a longer period of time as may be decided by the Company from time to time.

5. AMENDMENTS TO THE POLICY

Any subsequent amendment(s)/modification(s) in the Listing Regulations and/or other applicable Laws in this regard shall automatically apply to this Policy. The Managing Director / Company Secretary/ Chief Financial Officer of the Company is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall not be inconsistent with the provisions of the Listing Regulations.

Any clarifications / questions regarding this policy should be addressed to the Company Secretary.