

TECHNOPAINTS AND CHEMICALS LIMITED (“The Company”)

POLICY ON PRESERVATION OF DOCUMENTS

(Effective from 30.08.2026 approved by Board of Director on 29.08.2026)

1. PREAMBLE:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [“Regulations”] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

2. SCOPE:

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVE OF THE POLICY:

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same. The major objectives of the policy are:

- To identify statutory records to be preserved.
- To identify records to be maintained either for a period of eight years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form.
- To decide the procedure to destroy the documents after eight years or other applicable period,
- To help employees understanding their obligations in retaining and preserving the documents and records.

4. DEFINITIONS:

“Act” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

“Board of Directors” or “Board” means the collective body of the Directors of the Company.

“Company”, “This Company”, “The Company”, wherever occur in the policy shall mean “Technopaints and Chemicals Limited”.

“Current” means running matter or whatever is at present in course of passage.

“Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“Maintenance” means keeping documents, either physically or in electronic form.



“Policy” or “This Policy” means, “Policy on Preservation of Documents”.

“Preservation” means to keep the documents preventing them from being altered, damaged or destroyed.

“Register” means a register maintained under the Companies Act, 2013 or the SEBI Act.

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

5. INTERPRETATION:

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. GUIDELINES:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least 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.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that need to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure – A**.

7. MODES OF PRESERVATION:

The Documents may be preserved in

- a. Physical form; or
- b. Electronic Form

The official of the Company who is required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents. The preserved documents must be accessible at all reasonable times.

Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

Destruction of Documents:

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both physical and electronic documents. The documents may be destroyed as follows:

- a. Recycle Non confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records
- c. Delete or destroy electronically stored data.

8. Disclosure under other statutes and legislations

- a. All information required to be uploaded on the Company website in pursuance of any other statute/ legislation/ regulation, shall be hosted on the Company website in the form, manner and for such period as may be mandated by that statute/ legislation/ regulation etc.
- b. In cases where the concerned statute/ legislation/ regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of one (1) year from the date of uploading or more if deemed necessary.

9. Removal of records from website

Any Documents, information or form, etc. disclosed on the website may be removed or deleted from the website after such disclosure period as stated above.

10. Archiving

Post the disclosure period, the records removed from the website shall be placed in electronic archives. Depending upon the importance of records being removed, the Company may retain those records having long term value in the archives for permanent/ specified period storage and to suitably deal with the records accordingly.

11. POLICY REVIEW:

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

12. AMENDMENT:

The Board shall have power to 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 according to subsequent modification(s) / amendment(s) to Regulations.

ANNEXURE A

Indicative List

(i) Documents which are to be preserved permanently in the Company's records:

- a. Incorporation documents;
- b. The original signed and stamped Memorandum of Association and the Articles of Association of the Company;
- c. Minutes of General Meetings, Board Meetings and various Committee Meetings;
- d. Register of Members along with Index;
- e. Foreign Register of Members, if any;
- f. Register of loans, guarantee, security and acquisition made by the Company;
- g. Register of investments not held in its own name by the Company, if any
- h. Register of contracts with related party and contracts and Bodies etc. in which directors are interested;
- i. Register of Charges;
- j. Registers of Renewed and duplicate share certificates;
- k. Register of Directors and Key Managerial Personnel;
- l. Approval(s) and Product Registration & license(s) received from Statutory Authorities, Central & State Government(s);
- m. 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; and
- n. Preservation and safe custody of all books and documents relating to the issue of share certificates, including the blank forms of share certificates for a period of 30 years, and in case of disputed cases, permanently.

(ii) Documents which are to be maintained for at least eight financial years:

- a. Books of account together with the vouchers relevant to any entry in such books of account;
- b. Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company;
- c. Copies of all Annual Returns;

- d. E-forms filed with the Registrar of Companies;
- e. Disclosure of Interest received from the Directors of the Company in the manner prescribed;
- f. Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings;
- g. Instrument creating a Charge or modifying a Charge, if any;
- h. Changes to the Memorandum of Association and the Articles of Association, if any;
- i. Register of deposits accepted or renewed, if any
- j. Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for appeal, as the case may be;
- k. Employment /Personnel Record should be retained for a period of eight (8) years following cessation of employment in case of employees of the Company;
- l. Relevant marketing and sales documents;
- m. Legal documents including but not 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.
- n. Structured Digital Database as per SEBI (Prohibition of Insider Trading) Regulations, 2015, after completion of the relevant transactions and in the event of receipt of any information from any regulator / SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings. However, the disclosures made under Chapter III of the Insider Trading Regulations shall be preserved for a minimum period of five years

