

Policy for Preservation of Documents

1. Legal Framework

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposes certain obligations and disclosure requirements on all listed entities. One of the common obligations for all listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

Accordingly, the Board of Directors of Shalimar Paints Limited ("the Company") has approved this Policy for Preservation of Documents.

2. Definitions

A. "Board"

Board shall mean the Board of Directors of Shalimar Paints Limited.

B. "Company"

Company shall mean "Shalimar Paints Limited".

C. "Documents"

Documents shall mean all papers, records, files, books, etc., be in printed or in digital form and the like as required to be maintained under any law or regulation for the time being in force.

D. "Listing Regulations"

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

3. Objective

The purpose of this Policy is to have a framework for the preservation of documents of the Company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

- Documents whose preservation shall be permanent in nature as given in **Annexure 1** attached to this Policy.
- Documents with preservation period of not less than eight (8) years after completion of the relevant transactions as given in **Annexure 2** attached to this Policy.

Provided that the Company may keep the documents as specified above in electronic/digital mode.

4. Roles & Responsibilities

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

5. General

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

The Company will preserve documents relating to matters which are continuing in nature and are relevant to understanding of business.

6. Destruction of documents

After the expiry of the retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both physical and electronic Documents.

7. ERP Environment

The Company operates in an ERP environment. The database will be maintained and data purging, if necessary, will be carried out in accordance with this Policy.

8. Removal of difficulties

The Directors and the Company Secretary shall be jointly authorised to address any question or doubt and remove any difficulty during the course of implementation of this Policy in accordance with the same.

9. Amendments

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy.

Documents whose preservation shall be permanent in nature

1. Registration Certificates
2. Licenses & Statutory Approvals
3. Statutory Registers required under applicable laws
4. Audited financial statements
5. Minutes of General Meeting
6. Minutes of Board Meeting
7. Minutes of Statutory Committee Meetings
8. Material Agreements/Contracts, which, even if terminated, may have an impact on business
9. Orders/judgments issued by Courts/statutory bodies and other background documents relevant for understanding such Orders
10. Investment documents/proofs including certificates, etc.
11. Title deeds and documents pertaining to immovable freehold and leasehold properties
12. Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.
13. Tax-Exemption, Subsidy documents and related correspondences

Documents with preservation period of not less than eight (8) years

1. Books of Accounts
2. Annual Return(s)
3. Personnel Documents after retirement/resignation of the person concerned
4. Insurance Policies/ Claims under various policies after expiry or receipt of claim
5. Correspondences with Departments/shareholders
6. Non-Statutory Registers/Documents
7. All Emails received from Internal and External Sources related to business issues
8. Documents as are required to be maintained under relevant laws relating to direct and indirect tax
9. Any other document as may be required to be maintained for eight years in terms of applicable law(s).