

## **POLICY ON PRESERVATION OF DOCUMENTS**

## POLICY ON PRESERVATION OF DOCUMENTS

Approved by	Board of Directors
Effective Date	
Remarks, If any	

### I. OBJECTIVE AND SCOPE

In accordance with Regulation 9 and other applicable regulations of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR"), JSW Paints Limited, (hereinafter referred to as "Company") has formulated this policy on preservation of documents, as required thereunder ("Policy").

### II. DEFINITIONS

In this Policy, unless there is anything repugnant to the subject or context thereof, the capitalized terms used herein shall have the following meanings:

"Applicable laws" means securities laws defined under Regulation 2(1)(zf) of the SEBI LODR Regulations and other laws and statutes applicable to the Company mandating preservation of documents.

"Board" means Board of Directors of the Company as constituted from time to time.

"Company" means "JSW Paints Limited".

"Document/s" includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

### III. PRESERVATION OF DOCUMENTS

1. Pursuant to Regulation 9 of the LODR, Documents whether maintained in physical or electronic mode shall be preserved by the Company as and when applicable, for such period as more specifically set out under Annexure I, Annexure II, Annexure III and Annexure IV to the Policy hereto respectively. Documents enumerated in Annexure I shall be preserved permanently by the Company. Documents enumerated in Annexure II shall be preserved for a minimum period as specified against them (being a minimum period of eight years or such other minimum period as indicated therein) and thereafter, as per the discretion of the Compliance Officer. Documents enumerated in Annexure III shall be preserved for a minimum period as specified against them (being a minimum three years or such minimum period as indicated therein) and thereafter, as per the discretion of the Compliance Officer. Documents enumerated in Annexure IV shall be preserved for a minimum period as specified against them (being a minimum two years or such minimum period as indicated therein) and thereafter, as per the discretion of the Compliance Officer.
2. Documents in addition to being preserved under the LODR as mentioned hereinabove, shall upon the expiry of such period be preserved for such additional time period where specified

under the applicable laws (where a greater time period is prescribed under the applicable laws) and thereafter as per the discretion of the Compliance Officer.

3. Documents not specified in any of the Annexures shall be preserved for such period as may be specified under the applicable laws. If the applicability of the law cannot be ascertained or if there is no mandatory provision for preservation of such Documents, then such Documents shall be preserved for such period as the Compliance Officer may reasonably determine in this regard. The Compliance Officer shall be guided by the following principles to identify the requirement and duration of preservation of document:
  - such documents / records are statutory documents or regulatory approvals/consents;
  - such documents / records have some intrinsic value;
  - the information contained is/are generally available; and
  - upon an assessment of need of the user, such document(s) deserve to be preserved.
4. The Document shall be preserved in such form and manner as the Company may deem fit, in compliance with the applicable laws including in physical or electronic mode, as the case may be.
5. Every individual, including employees of the Company, involved with preservation of Documents must share a common responsibility as regards their physical/electronic security, and protection. All Documents must always be placed, handled, consulted and/or displayed in a way which minimises the risk of damage and takes due account of their size, shape and physical condition. Documents should be placed, handled, consulted and/or displayed with reasonable care in a safe and secure location. Any Documents withdrawn including for/on grounds of inspection, audit or otherwise including for issuance of records may be returned to their permanent place of storage after such purpose, examination, treatment, inspection, audit or consultation is completed. Employees involved in the preservation of Documents shall take all necessary steps to ensure security, integrity and confidentiality of records.
6. The custody of the Documents related to other functions/departments should be with the Group Head, and in his absence, the Function Head, of the respective department/function.
7. Notwithstanding anything to the contrary above, where a Document is subject to or may be required in relation to or relates to any matter which is subject matter or part of any legal, regulatory, judicial, quasi-judicial action/ inspection/ investigation/ impediments/ requirements/ proceedings (as the case may be), the same shall not be destroyed and shall be preserved properly beyond the minimum period prescribed as above, till required in accordance with/ for the purposes of any of the above actions, inspections etc.

#### **IV. CONFIDENTIALITY**

While preserving and storing Documents, it must be ensured that all Documents which the Company is under an obligation to keep confidential, or which contain any confidential information, are kept under safe custody of authorized personnel so as to ensure that the Company is not in violation of its confidentiality obligation against any third party.

## **V. ALTERATIONS TO THE POLICY**

The Policy shall be altered / modified by the Board of Directors as and when considered appropriate and necessary, subject to the condition that such alteration / modification to the Policy shall be in consonance with the applicable laws.

## **VI. DISPOSAL OF DOCUMENTS**

After the expiry of the period as may be prescribed under the applicable laws including the LODR, the preserved Documents shall be disposed off / destroyed except if such Documents are required to be preserved/ retained in relation to any legal/ regulatory/ judicial/ quasi- judicial action / inspection / investigation/ impediments/ requirements/ proceedings (as the case may be) as deem fit by the Company Secretary of the Company.

## **VII. OUTSOURCING**

To manage the Documents efficiently and economically the Company may avail services of professional record management companies / warehousing companies/third party vendors, whether in India, as the Company in its absolute discretion may deem fit and in compliance with the requirements of applicable laws if any, as deem fit by the Company Secretary of the Company.

## **VIII. INTERPRETATION**

In circumstances where the terms of this Policy differ from any existing or newly enacted laws, rules, regulations, guidelines, circulars or standards governing the Company including but not limited to any applicable laws; such applicable laws, rules, regulations or standards will take precedence over this Policy until such time as this Policy is amended to conform with the applicable laws, rules, regulations, guidelines, circulars or standards.

## **IX. REVIEW OF THE POLICY**

The Policy would be reviewed by the Board of Directors or as and when required.

ANNEXURE I – List of documents to be preserved permanently:

Sr No.	Name of the Document	Period
1.	Certificate of Incorporation and all the documents filed with the RoC at the time of incorporation	Permanent
2.	Certificate for Commencement of Business	Permanent
3.	Memorandum and Articles of Association	Permanent
4.	Register of Members (including Benpos received from RTA)	Permanent
5.	Register of contract/arrangement in which directors are interested	Permanent
6.	Minutes of meeting of the general meetings, Board of Director meetings and Committee meetings	Permanent
7.	Foreign register of members	Permanent
8.	Register of investment made by the Company not held in its own name	Permanent
9.	Policies formulated under various laws	Permanent
10.	Register of Charges	Permanent
11.	Agreements entered into by the Company with Stock Exchanges, Depositories, et.	Permanent

ANNEXURE II – List of documents to be preserved for minimum period of eight years or as indicated below and thereafter as per the discretion of the Compliance Officer:

Sr No.	Name of the Document	Period
1.	Register of Debenture holders with Index	8 years from the date of redemption
2.	Record of Private Placement	8 years
3.	Register of Directors and KMP	8 years from the date of last entry
4.	Register of Securities Buyback	8 years from the date of last entry
5.	Books of Accounts	8 years
6.	Notice of Disclosure of Interest by Directors	8 years from the end of the FY to which it relates
7.	Resolutions / agreements and any other documents filed with the Registrar of Companies except for documents pertaining to Incorporation and changes in any of the clauses of the MoA & AoA	8 years
8.	Annual Returns	8 years
9.	Notice Agenda and supporting papers	8 years
10.	Consent to Act as a Director	8 years from relinquishment of services
11.	Return of appointment of key managerial personnel	8 years
12.	Secretarial Audit Report	8 years
13.	Service Contract with Directors	8 years
14.	Securities Transfer form	8 years

15.	Order of court confirming reduction of share capital and certified copy of the order	8 years
16.	Notice of consolidation, division of share capital and conversion and reconversion into stock	8 years
17.	Notice served on the Company by the Registrar for inspection of books and conducts enquiries	8 years
18.	Annual Reports	8 years
19.	Declarations/Confirmations received under Code of Conduct	8 years
20.	Attendance Registers for Board and Committees of the Board	8 years
21.	Structure Digital Database	8 years from the completion of the relevant transaction and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.
22.	Instrument creating charge or modification thereon	8 years from the date of satisfaction of charge by the company
23.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means	8 financial years

ANNEXURE III – List of documents to be preserved for minimum period of three years or as indicated below and thereafter as per discretion of the Compliance Officer:

Sr No.	Name of the Document	Period
1.	Proxy Register/forms	3 years
2.	Proof of sending Notice, agenda, notes to agenda and its delivery	3 years
3.	Advertisement with prospectus	5 years
4.	Intimations filed with the stock exchanges	5 years
5.	Disclosure of Trading by employees and connected persons	5 years
6.	Advertisement of notice, results pursuant to listing regulations	5 years
7.	Record of shareholders complaint received and redressal of grievances	5 years
8.	Certificate of compliance received / issued under various laws	5 years

9.	Rejection letter for transfer / transmission of shares	5 years
10.	Transcript of calls pertaining to analyst or institutional investor meet	5 years

ANNEXURE IV – List of documents to be preserved for minimum period of two years or as indicated below and thereafter as per discretion of the Compliance Officer:

<b>Sr No.</b>	<b>Name of the Document</b>	<b>Period</b>
1.	Audio/ video recordings of analyst or institutional investor meet	2 years