

ASSOCIATED COATERS LIMITED

(Ashuti Khanberia Maheshtala LP 20/83/46, Kolkata, Vivekanandapur, South 24 Parganas, Thakurpukur
Mahestola, West Bengal, India, 700141)

CIN: U28129WB2017PLC224001

DOCUMENTS FOR PRESERVATION OF DOCUMENT AND ARCHIVAL OF DOCUMENTS

***[Regulation 9 read with Regulation 30(8) of the Securities and Exchange
Board of India (Listing Obligations and Disclosure Requirements)
Regulations, 2015 [“Listing Regulations”]***

Approved by Board of Directors at its meeting held on December 22, 2023

Documents for Preservation of Document and Archival of Documents

Introduction

The Securities and Exchange Board of India ("SEBI"), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"). The Regulations come into force from December 1, 2015. The Regulations mandate listed entities to formulate an archival policy.

The Board of Directors of ASSOCIATED COATERS LIMITED ("ACL"/ **The "Company"**) at its meeting held on December 22, 2023 has adopted this Policy for Preservation of Documents & Archival Process relating to its Corporate Entity and also various Registers, Forms, Returns, Statements and other Documents pertaining to its various functions and business operations. The Policy also deals with the process of archiving the aforesaid documents.

Purpose

In terms of the provisions of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Listing Regulations"], read with Regulation 30(8) requires the Listed Companies to disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a period of minimum 5 years and thereafter as per the archival policy of the Company, as disclosed on its website. Post the expiry of the above period of 5 years, the information would be archived and would be retained by the Company for a further period of 3 years or such other period as may be decided by the Board, from time to time. The purpose of this Policy is to disseminate equal, adequate and timely information to the shareholders through the website of the Company and to enable them to track the performance of the Company over regular intervals of time and provide sufficient information to enable investors to assess the current status of the Company.

Applicability

This Policy for Preservation of Documents & Archival Process shall be applicable with effect from December 22, 2023.

Definitions

In this Policy unless the context otherwise requires,

"Act" means the Companies Act, 2013 or the Securities and Exchange Board of India Act, 1992 or any statutory modification or re-enactment thereof and includes any Rules and Regulations framed thereunder, as the case may be in respect to the reference made in the provisions under this Policy;

"Articles" means the Articles of Association of the Company, as modified from time to time;

"Board of Directors" or "Board" means the collective body of the Directors of the Company;

"Books of account" means as defined in the Act;

"Committee" means a Committee of the Board;

"Document" means books of account, certificate, summons, notice, license, requisition, order, declaration, confirmation, evidentiary record, electronic record, electronic mail, instrument, statements, agreements, deeds, permissions, press release, returns, official publication, report, policies, record, form, register, voucher, minute book, whether issued, sent or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic mode;

"Electronic mail" means the message sent, received or forwarded in digital form using any electronic communication mechanism that the message so sent, received or forwarded is storable and retrievable; "Electronic mode" means data sent, received or forwarded is storable and retrievable using electronic medium;

"Electronic record" means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000;

"Key Managerial Personnel" means the Directors/Executives of the Company appointed as such under the Act;

"Maintenance" means keeping document(s), either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such documents;

"Meeting" means a meeting, duly convened and constituted, of the Board or any committee thereof or of the Members of the Company;

"Member" means any person who agrees, either by subscribing to the Memorandum of Association of the company or by applying in writing, to become a member of the company and whose name is entered either in the Register of Members of the Company or in the records of the Depository as a beneficial owner in respect of the equity shares of the Company held by him;

"Preservation" means to keep in good order; to prevent from being damaged or destroyed;

“Record” means a documentary evidence of past events or transactions;

“Register” means a register maintained under the Act and includes registers referred to in this Policy;

“Senior Management” mean personnel of the Company who are members of its core management team excluding the Board of Directors and including the Functional Heads.

Classification of Documents

Documents of the Company which are to be preserved are classified into the following categories:

- Documents which shall be preserved be permanent; &
- Documents which shall be preserved for a period of not less than 8 years from the date of completion of relevant transactions.

Detailed classification of documents to be preserved

| Sl. No. | Document Category | Document Type | Preservation requirement | Under the custody of |
|---------|--|--|--|----------------------|
| 1. | Corporate/ Organizational | <ul style="list-style-type: none"> ➤ Certificate of Incorporation; ➤ Memorandum of Association; ➤ Articles of Association; ➤ Statutory Licenses, Registrations and Permits; ➤ Permanent Account Number Card | Permanent | Company Secretary |
| 2 | Directors/ Key Managerial Personnel/Senior Management | <ul style="list-style-type: none"> ➤ Consent to act as a Director (Form DIR-2); ➤ Notice of disclosure of interests (Form MBP-1); ➤ Intimation of disqualification, if any (Form DIR-8); ➤ Disclosures made under SEBI (Prohibition of Insider Trading) Regulation, 2015; ➤ Resignation Letters; ➤ Service Agreements/Letter of Appointment; ➤ Correspondences with the Directors | Up to eight years from the date of resignation/cessation of the concerned person | Company Secretary |
| 3 | Finance & Accounting | <ul style="list-style-type: none"> ➤ Audited Financial Statements and related documents; ➤ Auditors Reports ➤ audited Financial Statements and related documents; ➤ Books of accounts and vouchers; ➤ Audit related documents; ➤ Management Letters; ➤ Investment Statements; ➤ Cost Records; ➤ Bank Statements; ➤ Forex transactions; ➤ Income tax Returns; ➤ Tax deduction records; ➤ Records relating to service tax; ➤ Records relating to Customs and Excise; ➤ Records relating to payment of gratuity; ➤ Details of Related Party Transactions. | Up to eight years from the date of document | CFO |
| 4 | Share & Secretarial | <ul style="list-style-type: none"> ➤ Annual Reports; ➤ Listing Agreement with the Stock Exchange(s); ➤ Tripartite Agreement with the Depositories and the Registrar and Share Transfer Agent (RTA) of the Company; ➤ Agreement with the RTA; ➤ Prospectus; ➤ Offer Document for Rights Issue; ➤ Documents related to Bonus Issue, Rights Issue; Stock split; ➤ Documents related to declaration of Interim and Final Dividend; ➤ General Meeting Minute Book; ➤ Board Meeting/Committee Minute Book; ➤ Resolutions passed by the Board/Committee in Circulation and related documents; | Permanent | Company Secretary |

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|---|----------------|--|---|-------------------|
| | | <ul style="list-style-type: none"> ➤ Statutory Registers; ➤ Company Policies/Charters/Bye laws; ➤ Secretarial Audit Report and the related documents; ➤ Books and documents relating to issue of share certificate including blank share certificates. | | |
| | | <ul style="list-style-type: none"> ➤ Investor Grievance correspondences; ➤ Correspondences with Statutory Authority(ies); ➤ Records from the RTA; ➤ General Meeting Notices; ➤ Documents relating to Postal Ballots; ➤ Board Meeting/Committee Meeting Notices; ➤ Board Meeting/Committee Meeting Agenda Papers; ➤ Attendance Register; ➤ Board Presentations; ➤ Certified Extracts from the Minute Book; ➤ Forms (including e-forms), returns and documents including agreements, receipts, undertakings, affidavits with the Registrar of Companies, Regional Director, Ministry of Corporate Affairs, Government of India, Central government and/or any other Statutory Authority(ies); ➤ Annual Return and related documents; ➤ Instrument creating a charge including modification and satisfaction thereof; ➤ Newspaper publications. | Up to eight years from the date of document | Company Secretary |
| 5 | Provident Fund | <ul style="list-style-type: none"> ➤ Records relating to Employees' Provident Fund; ➤ Accounts & Returns submitted to Regional Provident Fund Office; ➤ Electronic Challan Receipts (ECR). | Eight years | Managing Director |
| 6 | Legal | <ul style="list-style-type: none"> ➤ Property Records; ➤ Documents related to the Acquisition and Sale of Property; ➤ Records related to development of intellectual property including Patent, Trademark, Copyright or Trade Secret; ➤ Records of efforts not to Infringe any Patent, Trademark, Copyright or Trade Secret; ➤ Lease and Sale Agreements, Rent Agreements; ➤ Non-Disclosure Agreements; ➤ Contracts, Agreements (unless specifically addressed elsewhere in this policy), Deeds, Licenses; ➤ Documents related to past/ongoing litigations. | Permanent | Managing Director |
| 7 | Human Resource | <ul style="list-style-type: none"> ➤ Official files of present employees; ➤ Official files of ex-employees; ➤ Payroll records. | Eight years | Managing Director |
| 8 | Insurance | <ul style="list-style-type: none"> ➤ Insurance policies; ➤ Documents relating to Insurance claims, settled and pending. | Eight years | General Manager |
| 9 | General | <ul style="list-style-type: none"> ➤ Press Releases; ➤ Documents & Agreements with Media Company, PR Agency. | Eight years | General Manager |

Archival on the website of the Company

Disclosures made to the Stock Exchanges under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) shall be hosted on the website of the Company for a period of five (5) years and thereafter, from time to time, archived under an archival folder and/or be accessible through a single URL from the website of the Company.

However, for any disclosure of event which is the subject matter of any ongoing litigation and/or required to be preserved in terms of applicable provisions of Law/Statute, such disclosure shall continue to remain on the website of the Company irrespective of its duration thereat.

Destruction/disposal of documents

The employees of the respective departments shall be entitled to destroy/dispose of the documents mentioned in the policy only with prior approval of the respective functional heads who are authorized to preserve such documents.

Monitoring and evaluation of the Policy

This Policy will be reviewed by the Board from time to time and if required, modify the same in order to comply with the statutory requirements and also to incorporate the best industry practices.