



[Pursuant to Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

PURPOSE

The purpose of this Record Retention and Destruction Policy (“The Policy”) is to ensure that the company retains its official records in accordance with the requirements of all applicable laws and to ensure that official records no longer needed by the Company are discarded at the proper time. This Policy provides guidelines concerning the length of time official records should be retained under ordinary business circumstances, as well as the steps that the Company should take in the event of any pending government investigation, audit or proceeding, or any civil or criminal lawsuit involving the Company.

POLICY

This Policy represents the Company’s formal policy regarding the retention and disposal of documents and official records related to and generated in the course of the Company’s operations.

COVERED RECORDS

This Policy applies to all official records generated in the course of the Company’s operations, including but not limited to: typed, or printed hardcopy (i.e., paper) documents; electronic records and documents (e.g., email, Web files, text files, PDF files); video or digital images; graphic representations; electronically stored information contained on network servers and/or document management systems; and recorded audio material (e.g., voicemail).

ADMINISTRATION

- a. Record Retention Schedule. Attached to this Policy is a Record Retention Schedule (Annexure A) that is approved as the maintenance, retention and disposal schedule for official records of the Company. The Compliance Officer shall administer this Policy and implement reasonable processes and procedures concerning the Record Retention Schedule.
- b. Authority and Responsibility of the Compliance Officer. The Compliance Officer shall be authorized to: (a) make modifications to the Record Retention Schedule from time to time to ensure that this Policy complies with local, state and central laws and includes the appropriate document and record categories for the Company; (b) monitor local, state and central laws affecting record retention; (c) monitor the compliance of the Company’s officers and employees with this Policy; and (d) take such other action as may be authorized by the Company’s Board of Directors. The Compliance Officer shall periodically review the Company’s record retention and disposal program and shall apprise the Company’s directors of any changes in laws relating to the Company’s record retention and disposal program.

- c. **Distribution of Policy to Employees and Officers.** The Compliance Officer will arrange for every officer and employee who may have control over or responsibility for the Company's documents to receive a copy of this Policy and each such officer and employee shall sign a statement (Annexure B) that affirms that he or she has received a copy of this Policy, has read and understands it, and has agreed to comply with it. If the officer or employee reasonably believes that an independent contractor or agent of the Company will have control or responsibility for the Company's documents, then the officer or employee shall require the independent contractor or agent to execute a statement substantially similar to the statement attached to this Policy.

RECORD STORAGE PROCEDURES

- a. **Organization of Records.** In order to facilitate administration of this Policy, where practicable, the Company's official records should generally be organized and stored according to general categories in a manner that best facilitates the efficient administration of the Company's operations where appropriate. Records within each category should generally be organized and stored in chronological order or by time period (e.g., by month or year).
- b. **Dating of Records.** Categories of records not required to be retained on a permanent basis (according to the Record Retention Schedule) should be maintained by date or conspicuously dated to enable such records to be easily identified for destruction at the end of the record retention period specified in the Record Retention Schedule.
- c. **Confidentiality of Records.** Records containing confidential information should be labeled and/or stored in a manner to limit access to those employees or other individuals with authorization to view such records. Any of the Company's email, regardless of the nature of the content, may be subject to disclosure in the course of a government investigation or litigation involving the Company.
- d. **Electronic Storage System.** The Compliance Officer is authorized to develop and implement a system for maintaining the Company's records via an electronic storage system that either images hardcopy records or transfers computerized records to electronic storage media (e.g., hard drives, storage area networks, or optical media, such as CDs and DVDs). Any electronic storage system shall also comply with the requirements of Information Technology Act, 2000 applicable to electronic storage records.

DOCUMENT DESTRUCTION PROCEDURES

Once records have been retained for the applicable period set forth in the Record Retention Schedule, they should be prepared for destruction in the manner prescribed by the Compliance Officer, unless the Compliance Officer has suspended the destruction of any records in accordance with clause 7. The Compliance Officer shall develop procedures for destroying categories of records that are not listed in the Record Retention Schedule at times and in an effective manner that best facilitates the efficient administration of the Company's operations. All paper documents destroyed pursuant to this Policy shall be cut by mechanical shredder. Electronic data contained on servers and hard drives shall be deleted and overwritten. Electronic data contained on all other media shall be destroyed by the physical destruction of that media.

SUSPENSION OF RECORD DISPOSAL IN EVENT OF LITIGATION OR CLAIMS

In the event any employee of the Company reasonably anticipates or becomes aware of a governmental investigation or audit concerning the Company or the commencement of any litigation against or concerning the Company, such employee shall inform the Compliance Officer and any further disposal of documents shall be suspended until such time as the Compliance Officer, with the advice of the Managing Director and the Company's legal

counsel, determines otherwise. The Compliance Officer shall take such steps as are necessary to promptly inform affected staff of any suspension in the disposal or destruction of documents.

CONFIDENTIALITY AND OWNERSHIP

All records are the property of the Company, and employees are expected to hold all business records in confidence and to treat them as the Company's assets. Records must be safeguarded and may be disclosed to parties outside of the Company only upon proper authorization. Any subpoena, court order or other request for documents received by employees, or questions regarding the release of the Company's records, must be directed to the Compliance Officer prior to the release of such records. Any records of the Company in possession of an employee must be returned to the employee's supervisor or the Compliance Officer upon termination of employment.

Annexure A

RECORD RETENTION SCHEDULE

This Record Retention Schedule sets forth an abbreviated schedule of key record-keeping holding periods and maintenance requirements. It is not intended to and does not provide a complete compilation of all central or state law record-keeping holding periods or maintenance requirements.

ORGANISATIONAL RECORDS

Record Type	Retention Period
Annual Audit Reports and Financial Statements	Permanent
Corporate Records (minutes books, minutes and resolutions of the Board and committees, bylaws and amendments, annual corporate reports)	Permanent
Licenses and Permits	Permanent
Policy and Procedures Manuals Permanent Research & Publications	Permanent
Original Purchase/Sale/Lease Agreements (and related transaction materials)	Permanent
Trademark Registrations, Patents, Copyrights and Intangibles	Permanent
Employee Handbooks and Training Manuals	Permanent
Equipment Records	Permanent
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	Permanent
Litigation Files (including disposition orders)	8 years after disposition
All Other Company Records (not specifically addressed)	5 years after disposition or such other higher period as may be decided by the MD.

ACCOUNTING & FINANCE RECORDS

Record Type	Retention Period
Books of Accounts and Vouchers	8 Previous years
Annual budgets and approved revisions thereon	3 Previous years

OTHER RECORDS

Record Type	Retention Period
Corporate Tax Records	Permanent
Personnel Records	8 Previous years
Insurance Records Insurance Policies (including expired policies), Insurance Certificates Issued to the Company, Insurance Claims Files (including correspondence, medical records, injury documentation, etc.)	8 Previous years

Annexure B

RECORD RETENTION AND DESTRUCTION POLICY AFFIRMATION STATEMENT

I, _____, employee of the Thirumalai Chemicals Limited have read and understand the foregoing Record Retention and Destruction Policy and hereby agree to comply with same.

Name of Employee

Designation

Date

Initialed by the Chairman of the Audit
Committee Mr. Ravi Shankar (DIN:
01224361)