

Akzo Nobel India Limited

POLICY ON PRESERVATION OF DOCUMENTS

(Approved by the Board of AkzoNobel India Limited at its meeting held on 29 Jan 2016)

Objective

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

Provided that the Listed entity may keep documents specified in clause (a) and (b) in electronic mode.

In line with the above, the objective of this Policy is to provide a binding framework for preservation of documents maintained by the Company under various applicable laws including Companies Act 2013 and Listing Regulations.

Applicability

This Policy shall be applicable to all documents maintained in physical and electronic mode by the Company. The documents not covered in this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable

Period of Reservation:

The period of preservation of documents has been tabulated in the Annexure.

Mode of Preservation

Records/documents may be preserved either physically or in electronic form.

Review/ destruction of records

The records/documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal.

Review of Policy

The Policy shall be reviewed on a periodic basis. The Board of Directors/ Company Secretary are authorized to make such changes as may be deemed necessary or as warranted by law.

Annexure

Document	Period of Preservation
Documents evidencing registration/incorporation of the Company/change of name etc. and Constitution documents such as Memorandum and Articles of Association	Permanently
Statutory Registers, Minutes book, Original signed Financial Statements and Annual Return prepared under the Companies Act, 1956/ 2013	Permanently
Documents relating to issue/allotment of securities (Prospectus, Letter of Offer, Register of Allotment, etc.)	Permanently
Notices and Agenda of the Board Meeting/Annual General Meeting/Extra Ordinary General Meeting and Attendance Registers of Board/committee meetings, declarations from Directors etc	For eight financial years.
Court Orders relating to amalgamations/mergers/de-mergers etc. and approval of Central/State Governments	Permanently
Various filings made with Registrar of Companies, stock exchange(s), Reserve Bank of India or any other statutory authority(ies)	Permanently
Books of Accounts of the Company	As required under Companies Act 2013 & / or Tax Laws (minimum 8 years)
Various policies adopted by the Board of Directors	Permanently
Approvals/Permissions/Consents for carrying out any activity/Business	Permanently
Contracts entered into by the Company from time to time	For eight years after the expiry of the term of the contract.
Documents relating to legal cases and litigation relating to the Company	For eight years after completion of legal proceedings.
Taxation Documents including documents concerning tax assessment, tax filings, tax returns, proof of deductions, Challans, appeals preferred against any claim made by the relevant tax authorities	For eight years or till completion of assessment whichever is later.
HR Documents including records or Documents relating to recruitment, employment and personnel information, remuneration, entitlements, performance review, action taken by or against any employee, complaints by or against any employee	Till such time the person is in employment with the Company and thereafter for a period as per HR Policy of the Company.
Legal opinions, Power of attorneys, Authority Letters, orders/judgments/ awards of the court /tribunal /authorities	Permanently
Documents relating to any property owned by the Company.	Permanently
Intellectual property Rights documents shall include, but not be limited to copyrights, trademarks, patents, and industrial designs. Intellectual property rights documents that are owned by the Company	Permanently
Licenses obtained by the Company	Eight (8) years from the date of expiry/ termination of the License.
Any other statutory documents not covered above	For eight (8) financial years.