

ARCHIVAL POLICY

(For Preservation and Archival of Documents)
of Three M Paper Boards Limited

1. Preamble

This Archival Policy ("Policy") is framed pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR Regulations"). The Company recognizes the need to have a well-defined system for preservation and archiving of documents, especially those made available on its website, to ensure compliance, transparency, and good governance practices.

2. Objective

The objective of this Policy is to ensure:

- Proper maintenance, preservation, and archiving of documents (both physical and electronic).
- Systematic retrieval of information whenever required by stakeholders, regulators, or internal management.
- Compliance with statutory requirements under the Companies Act, 2013, SEBI Regulations, and other applicable laws.

3. Scope

This Policy applies to all documents, records, disclosures, and information of the Company, including but not limited to:

- Financial statements, results, and related disclosures.
- Shareholding patterns, corporate governance reports, and press releases.
- Annual Reports and related filings.
- Statutory registers and records as required under the Companies Act, 2013.
- Policies, codes, and internal circulars.
- Any other information as required under applicable laws or deemed necessary by the management.

4. Preservation of Documents

The documents shall be preserved in the following manner:

a) Permanent Preservation (not to be destroyed):

- Certificate of Incorporation, Memorandum & Articles of Association.

(Formerly known as "Three M Paper Boards Pvt. Ltd." & "Three M Paper Mfg. Co. Pvt. Ltd.")

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- Licenses, approvals, and statutory registrations.
- Minutes of Board and General Meetings.
- Statutory registers under the Companies Act, 2013.
- Secretarial Audit Reports and Corporate Governance compliance records.

b) Preservation for at least 8 years (as per Companies Act, 2013 & Income Tax laws):

- Books of Accounts and vouchers.
- Annual Returns and related filings.
- Board/Committee papers and presentations.
- Agreements, contracts, and correspondence.
- Financial statements and Auditor's Reports.

c) Preservation as per business requirement (minimum 3 years):

- Operational records (production, sales, purchases, exports/imports).
- Quality, safety, and environment compliance documents.
- HR & Payroll records.
- Marketing and customer records.

5. Archival of Documents on Website

- As per Regulation 46 of LODR, all disclosures made on the Company's website shall be kept for a minimum period of **5 years** from the date of disclosure.
- Thereafter, the documents shall be moved to the "Archives" section of the website, where they shall be available for at least **3 additional years**.
- After the completion of the above period, documents may be removed, subject to preservation of a copy in offline mode for reference.

6. Mode of Archival

- **Physical Records:** Stored at the Company's Registered Office or such other location as may be approved by the Board.
- **Electronic Records:** Maintained on servers with appropriate security, backup, and retrieval systems.
- **Website Records:** Maintained on the official website of the Company under "Investor Relations" and archived systematically.

7. Responsibility

- The **Company Secretary & Compliance Officer** shall be responsible for the implementation, monitoring, and review of this Policy.
- Functional heads shall ensure preservation of records pertaining to their departments.



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8. Review & Amendments

This Policy shall be reviewed by the Board of Directors as and when required to align with applicable laws and best practices. Any amendments shall be approved by the Board.

9. Disclosure

This Policy shall be placed on the website of the Company and a web link thereto shall be provided in the Annual Report as required under the LODR Regulations.

This policy was approved and adopted at the Board Meeting held on September 5, 2025.

This policy is available on the Company's website at: http://threempaper.com/company_policies.html