ROYAL CHAIN LIMITED
(FORMERLY KNOWN AS ROYAL CHAIN PRIVATE LIMITED & ROYAL CHAINS PRIVATE LIMITED)
GST : 27AAGCR6146R1ZL CIN : U74120MH2013PLC247888
Registered Office : 1st Floor, 127/129, Office No. 101/102,Royal House, Shaikh Memon Street,
Zaveri Bazaar, Kalbadevi,Mumbai - 400002. Maharashtra.

POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

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POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

[Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

A. PREAMBLE:

The SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 ("**SEBI Listing Regulations**") require every listed company to formulate a policy on preservation of documents and archiving of documents ("**Policy**") which has to be approved by the Board of Directors.

In this context, the following policy has been framed by the Board of Directors ("**Board**") of Royal Chain Limited ("**Company**") with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation of the documents of the Company under applicable law (*defined below*).

The Policy has been adopted and approved by the Board of Directors at its meeting held on 08th September 2026

DEFINITIONS:

i) Act-

Shall mean the Companies Act, 2013 and rules framed thereunder, notified by the Ministry of Corporate Affairs, Government of India, as amended from time to time.

ii) Applicable Law-

Shall mean securities laws as defined under Regulation 2(1)(zf) of the SEBI Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

iii)Board of Directors and Directors-

Shall mean the Board of Directors of the Company, as constituted from time to time and Director shall mean all the members of the Board of Directors of the Company, including the Independent Directors.

iv) Documents-

Includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

v) Electronic Form-

Shall mean any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

vi) Preservation-

Means maintenance of documents either physically or in electronic form, files and records in usable form in good order and to prevent them from being altered, damaged or destroyed.

B. OBJECTIVE AND SCOPE OF THE POLICY:

The objective of this Policy is to classify the documents, records and registers of the Company which are required:

a) Documents which need to be preserved permanently by the Company, subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company.

b) Documents with a preservation period of not less than the time period stipulated in the SEBI Listing Regulations and other laws and statutes applicable to the Company from time to time after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for the said period. This is currently eight (8) years.

C. PRESERVATION OF DOCUMENTS:

a) The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made there under, the secretarial standards, the listing regulations and any other law, rules, regulations as may be applicable to the Company from time to time.

b) Documents to be maintained and preserved permanently:

The Company shall maintain the follows documents on a permanent basis:

i) Documents filed with ROC for incorporation of the Company
ii) Certificate of incorporation including all fresh certificates of incorporation, certificate of commencement of business, if any, and common seal.
iii) The original signed and stamped memorandum of association and the articles of association of the Company;
iv) Minutes of general meetings, board meetings and various committee meetings;
v) Register of members along with index;
vi) Foreign register of members, if any;
vii) Register of debenture holders (including foreign register of debentures) or register for any other securities issued by the Company;
viii) Register of loans, guarantee, security and acquisition made by the Company;
ix) Register of investments not held in its own name by the Company, if any;
x) Register of contracts-with related party and contracts and bodies etc. in which directors are interested;
xi) Register of charges;
xii) Registers of renewed and duplicate share certificates;
xiii) Register of directors and KMP;
xiv) Register of significant beneficial owners
xv) Payroll registers;
xvi) PF, Bonus, Gratuity and other Statutory Registrations, Returns and Records;
xvii) Licenses Issued and permissions by Regulatory Authorities
xviii) Intellectual property documents shall include, but shall not be limited to copyrights, trademarks, patents, and industrial designs. Intellectual property rights that are owed by the Company shall be retained by the Company permanently.
xix) Any other records / documents which will have a permanent value for the company event after the expiry of the of legal preservations period

c) Documents to be maintained for at least eight financial years:

i) Books of accounts together with the vouchers relevant to any entry in such books of accounts;
ii) Copies of all annual returns
iii) Disclosure of interest received from the Directors of the Company in the manner prescribed;
iv) Attendance registers, notices, notes on agenda and other related papers of general meetings, board meetings and various committee meetings;
v) Instrument creating a charge or modifying a charge, if any;
vi) Changes to the memorandum of association and the articles of association, if any;
vii) Register of deposits accepted or renewed, if any;
viii) Tax Records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax authorities shall be -maintained for a period of 8 (eight) years or for a period of 8 (eight) years after a final order has been received with respect to any matter which was preferred for appeal, as the case may be;
ix) Employment/personnel record in case of employees of the Company;
x) Relevant marketing and sales documents;
xi) Press releases;
xii) Legal documents including but not limited to contracts, legal opinions pleadings, orders passed by any court or tribunal, judgments, interim orders, documents relating to cases pending in any Court or Tribunal or any other authority empowered to give a decision on any matter, awards, documents relating to property matters;
xiii) Disclosures under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
xiv) Documents on which the common seal of the Company has been affixed (other than those which are prescribed to preserved for a longer period of time).
xv) Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion

D. MANAGEMENT OF DOCUMENTS:

i) The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company. All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under various rules and regulations.

ii) The officer(s) of the Company who is / are generally expected to observe the compliance of requirements of Applicable Laws shall be the person(s) responsible to preserve the Documents.

iii) It is the duty of the heads of the respective departments of the Company to ensure that there is no tampering, alteration, destruction or any other action which would endanger the content, authenticity, utility and accessibility of the documents.

iv) The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorised person for preservation, to ensure integrity and confidentiality of the Documents and prohibit unauthorised access.

v) The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

E. DISPOSAL AND DESTRUCTION OF RECORDS:

After the expiry of the retention period, the preserved Documents may be destroyed in such mode as may be recommended by the authorized person and approved by the [managing director] of the

Company. The details of Documents destroyed by the Company shall be recorded in the register of disposal of records to be kept by authorised persons who are disposing of the Documents in the format prescribed in the [guidance manual].This applies to both physical and electronic Documents.

This applies to both physical and electronic Documents. Provided that, no Document shall be destroyed unless the applicable retention period prescribed under Regulation 9 of the SEBI Listing Regulations, the Act, or any other Applicable Law has expired. The Documents may be destroyed as follows:

a) Recycle non-confidential paper records;
b) Shred or otherwise render unreadable confidential paper records; or
c) Delete or destroy electronically stored data.

The Company shall maintain a register of disposal of records, wherein it shall enter brief particulars of the Documents destroyed, the date of destruction, and the authority under which such destruction was carried out. All entries made therein shall be authenticated by the Company Secretary or such other person as may be authorised by the Board for the purpose. Inspection of this register shall be restricted to authorised personnel only.

F. ARCHIVAL OF INFORMATION:

1. Disclosures under Regulation 30(8) of the SEBI (LODR) Regulations, 2015:

a) In accordance with Regulation 30(8) of the SEBI Listing Regulations, all events or information disclosed to the Stock Exchanges under Regulation 30 and other applicable provisions of the SEBI Listing Regulations shall be hosted on the Company's website for a minimum period of five (5) years from the date of such disclosure, or for such longer period as may be prescribed under law or deemed necessary by the Company.
b) Thereafter, in accordance with this Policy (and not as a statutory requirement under the SEBI Listing Regulations), such disclosures shall be moved to an archival section of the Company's website, where they shall remain accessible for an additional period of not less than two (2) years, or such longer period as the Board may determine from time to time.
c) As an internal operational measure, the process of archival shall be carried out on a quarterly basis, ensuring that all disclosures remain available to stakeholders for the defined retention period.

2. Disclosures under Other Statutes and Legislations:

a) Any information required to be uploaded on the Company's website pursuant to any other applicable statute, legislation, or regulation shall be published in the form, manner, and duration specified under the respective law or regulation.
b) Where the relevant legislation does not prescribe a specific retention period, such disclosures shall remain hosted on the Company's website for a minimum period of one (1) year from the date of publication, or longer if deemed appropriate by the Company based on relevance or stakeholder interest.
c) The Company shall periodically review its website to ensure that all disclosures, both current and archived, are appropriately maintained, accessible, and compliant with regulatory requirements.

G. REMOVAL OF RECORDS FROM WEBSITE:

Any Documents, information, form, or return etc. disclosed on the website may be removed or deleted from the website only after the expiry of the minimum period prescribed under Regulation 30(8) of the SEBI Listing Regulations (i.e., five (5) years) or the relevant Applicable Law, and the additional archival period specified in this Policy, whichever is later.

H. ARCHIVING:

All disclosures and documents uploaded on the Company's website shall be archived upon completion of their display period in accordance with applicable laws and internal guidelines. The archiving process ensures that records remain securely stored and accessible for reference, regulatory review, or stakeholder queries. Archived information shall be maintained in a manner that preserves data integrity and prevents unauthorized alteration or deletion. Access to archived documents will be restricted to authorized personnel only. The Company shall review and update its archiving procedures periodically to ensure continued compliance with regulatory requirements and best practices.

I. LIMITATION AND AMENDMENT:

In the event of any conflict between the provisions of this policy and provisions of the Companies Act, 2013 (and the rules framed thereunder) or the Regulations or any other statutory enactments, rules, the provisions of such Act or Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Regulations, Companies Act, 2013 (and the rules framed thereunder) and/or applicable laws in this regard shall be deemed to be covered under this Policy. The Board shall have the right to withdraw and / or amend and / or modify any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and mandatory.

J. COMPLIANCE

All employees of the Company are required to comply with the provisions of this Policy and the [guidance manual]. Failure to comply by any employee of the Company with this Policy and the [guidance manual] may result in disciplinary action by the Company, including suspension or termination of employment.

Any queries regarding this Policy may be referred to the responsible person, who is in charge of administering, enforcing and updating this Policy.

K. INTERPRETATION

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy.

Effective Date:
Date of approval by the Board: 08th September 2026

Sd/-
Chairman Signature

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