

VASHISHTHA LUXURY FASHION LIMITED

POLICY FOR ARCHIVAL OF WEBSITE DISCLOSURES AND PRESERVATION OF RECORDS AND DOCUMENTS

1. Purpose of Policy

Regulation 9 of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**"LODR Regulations"**) requires every listed company to have a Policy on Preservation of documents/ records (**"Policy"**) either in Physical Mode or Electronic Mode, which shall, *inter alia*, provide for,

- Documents whose preservation shall be of permanent nature.
- Documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy.

This Policy was approved by the Board of Directors of the Company at its meetings held on 1st July 2024. This Policy shall be effective from 1st July 2024.

2. Objective

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed, or which are of no value are discarded after following due process for the same. The major objectives of the policy are:

- a. To identify statutory records to be preserved.
- b. To identify records to be maintained either for a period of eight years or permanently.
- c. To decide the mode of preserving the documents, whether in physical form or in electronic form.
- d. To decide the procedure to destroy the documents after eight years or other applicable period.
- e. To help employees understanding their obligations in retaining and preserving the documents and records.

3. Definitions

"Company" means Vashishta Luxury Fashion Limited.

"Board" means the board of directors of the Company.

"Records and documents" all corporate records and documents maintained by the Company in physical or electronic mode.

"Electronic Records" means as defined in Information Technology Act, 2000 or

as amended from time

“Electronic Form” with reference to information means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space or 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.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

4. Mode of Preservation

The records and documents may be preserved in:

- Physical form or
- Electronic form.

The preservation of records and documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents, other than disposal of Documents as permitted under this Policy.

The preserved records and documents must be accessible at all reasonable times. Access shall be controlled by the Authorized Persons, so as to ensure integrity of the records and documents and prohibit unauthorized access.

5. Policy Statement

To facilitate the efficient and effective operation of the company, all business records and documents should be kept no longer than the period necessary for the proper conduct of the company's Business.

This policy shall cover all business records and documents of the company, including written, printed and recorded matter and electronic forms of records including email messages in personal folders which relates to the company.

The records and documents mentioned in **Annexure A** are the ones whose preservation shall be permanent. The rest of all records and documents shall be maintained for a period of eight (8) years from the date generated. No records and documents which are not permanent in nature shall be destroyed unless destruction thereof is sanctioned by the Board of Directors of the Company.

6. Authority and Responsibility

The Departmental Head concerned will be responsible for the preservation, maintenance and destruction of the records according to the time frame prescribed in the Policy pertaining to the respective Department.

All staff and management of the Company shall assist in implementing this Policy as appropriate to their roles and responsibilities.

7. E-mails:

E-mail Archival Policy of the Company will be applicable to all the emails of employees under which, inter alia, users' emails are archived automatically for backup and retained in Enterprise Vault for three (3) years. Account holders are responsible for maintaining a copy of the item in the appropriate file if the time is required to be retained beyond three (3) years.

Keeping in view the documents retention and audit requirements, all E-mails from internal and external sources that may be considered to be important having significant impact on business transaction should be archived for such relevant period as may be applicable by either:

- (i) printed in hard copy and kept in the appropriate file; or
- (ii) Downloaded to a computer file and kept electronically or on disk as a separate file.

8. Disposal of Records

The destruction and disposal of the records and documents shall be done in compliance with the provisions prescribed under the applicable laws and in consideration of this Policy of the company. All records and documents containing information of a confidential or sensitive nature whether in physical or electronic form must be securely destroyed when no longer required.

The Company shall maintain a Register of disposal of records and documents in the custody of the Company, wherein the brief particulars of the records preserved and/or removed/destroyed after the expiry of its preservation period shall be entered.

9. Review of Policy

The Board reserves the power to review and amend this Policy from time to time. All provisions of this Policy would be subject to revision / amendment in accordance with

the applicable law issued by relevant statutory, governmental and regulatory authorities, from time to time.

Annexure A –

Records and documents to be preserved Permanently -

1. Memorandum and Articles of Association of the Company.
2. Register and index of members of the Company.
3. Minutes of the meeting of the Board of Directors of the Company.
4. Minutes of the meeting of the members of the Company.
5. Licenses and Permissions obtained for the conduct of company's Business.
6. Register of Charge.
7. Register of renewed and duplicate share certificate.
8. Register of contract and arrangement in which the Directors are interested.
9. Blank share certificate and related books and documents thereto.
10. Register of Loans and investments.
11. Such other records and documents as may be specified by the Board from time to time.