



ARCHIVAL POLICY

(Framed on 01st April, 2023)

PURPOSE

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, (**hereinafter referred to as “Listing Regulations”**) and Companies Act, 2013. SEBI has mandated all the listed entities to have a policy on Preservation and Archival of Documents. Archival Policy as referred to in Regulation 30 (8) of the Listing Regulations forms part of this Policy. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

ARCHIVAL REQUIREMENT

The purpose of this documents to present a high level policy statement for Khazanchi Jewellers Limited (**“the Company”**) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 (**“the Act”**), SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**“the Regulation”**) and any other applicable laws to the Company.

Considering the requirements as prescribed under SEBI LODR, the Board of Directors has formulated this policy known as **Khazanchi Jewellers Limited-Archival Policy**.

MODE OF PRESERVATION & RESPONSIBILITY

The Authorized Person shall:

- a.Preserve the Documents either in physical form or electronic form;
- b.Preserve the Documents in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents;
- c.Ensure that the preserved Documents are accessible at all reasonable times;
- d.Control access for preserved Documents, to ensure integrity and confidentiality of the documents and prohibit unauthorised access;
- e. Make appropriate provisions for back up of all preserved Documents, both physically and electronically.

DESTRUCTION OF DOCUMENTS

After the expiry of the retention period, the Authorized Person may destroy the preserved Documents in such a mode as deemed fit. The Compliance Officer of the Company shall approve the destruction of such Documents.

The Authorized Person shall maintain a register of disposal of records, with details of Documents destroyed in the format prescribed in the guidance manual. This applies to both physical and electronic Document.

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- a. The Company will host all the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations on the website of the Company under the section entitled [“Investor Relations”] for a period of five years and thereafter the same shall be archived for retrieval for three years under the head “Past events or information” as decided by the Compliance Officer of the Company.
- b. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary of the Company.
- c. This Policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.

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.

AMENDMENT

Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and/or amend 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 binding. Any subsequent amendment/modification in the Act or the rules framed thereunder or the SEBI Listing Regulations and/or any other laws in this regard shall automatically apply to this Policy.