

DCW LTD

ARCHIVAL POLICY

[Pursuant to Regulation 30(8) of the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015)]

1. **BACKGROUND**

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Listing Regulations come into force from December 1, 2015. In terms of Regulations 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the ‘Regulations’), a listed entity is required to host on the website maintained by the entity, all the material events/ information as disclosed to the stock exchange(s) for a period of five years and thereafter in terms of the Archival Policy of such entity as disclosed on the website. It is in this context that the Document Retention and Archival Policy (“Policy”) is being framed and implemented.

2. **OBJECTIVE OF THE POLICY**

The objective of this Policy is to classify the documents in two categories;

- (i) documents which need to be preserved permanently and
- (ii) documents which need to be preserved for a specific period of time.

3. **DEFINITIONS-**

3.1) “*Act*” means the Companies Act, 2013.

3.2) “*Applicable Law*” means any law, rules, circulars, guidelines or standards under which disclosure of Events or Information on the website has been prescribed.

- 3.3) “**Archived documents**” means details of Events or Information (defined herein below) as placed or maintained in the archived folder.
- 3.4) “**Authorised Person**” means **Ms. Ms. Jigna Karnick**, Company Secretary of the Company or any other person as may be decided by the Board or Managing Director or Whole Time Director from time to time.
- 3.5) “**Board**” means the Board of Directors of the Company or its Committee.
- 3.6) “**Company**” means “**DCW LIMITED**”.
- 3.7) “**Events or Information**” refers to the information/ events that are required to disclose on the website of the Company in terms of Regulation 30(8) of the Regulations and other Applicable Law.
- 3.8) “**Regulations**” means the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

4. POLICY

The Corporate records of **DCW LIMITED** (the “Company”) are important assets. Corporate records include essentially all records, whether paper or in electronic form. A record may be in the form of a memorandum, an e-mail, a contract or a case study and includes computerized desk calendar, an appointment book or an expense record etc.

The Law requires the Company to maintain certain types of corporate records either permanently or for a specified period of time. Failure to retain the records could subject the employees and the Company to penalties and fines, cause the loss of rights, obstruct justice, adversely impact potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

The Company expects all employees to fully comply with this Policy, provided that all employees should note the following general exception to any stated destruction schedule.

If an employee has reasons to believe, or the Company informs the employee concerned, that Company records are relevant to litigation or potential litigation (i.e., a dispute that could result in litigation), then the employee must preserve those records until the Legal or

Respective Department determines that the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records. If an employee(s) believe that exception may apply, or has any question regarding the possible applicability of that exception, he/she may contact the Office of Group General counsel.

The Company, from time to time establishes retention or destruction policies or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property. While minimum retention periods are suggested, the retention of the documents identified in those schedules and of documents not included in the identified categories should be determined by the Head of the Department, primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

5. COVERAGE

This Policy covers Archival of all Events or Information which has been disclosed to Stock Exchange(s) and hosted on the website of the Company in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Applicable Laws.

6. CLASSIFICATION

The Archival of Events or Information as disclosed or hosted on the website shall be done in the following manner:

- a) Where there is a period for which a Document is required to be archived as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for a period of not less than three years.

7. LEGAL DOCUMENTS

Legal Documents shall include, but shall not be 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.

A contract shall be retained for a period of 8 (Eight) Years or for 8 (Eight) Years after the expiry of the term of the contract, whichever is higher.

Documents relating to any property owned by the Company shall be retained perpetually. Other property Documents shall be retained for a period of 8 (Eight) Years or for a period of 8 (Eight) Years after the rights in such property ceases to exist, whichever is higher. Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded shall be retained permanently. Interim Orders shall be retained till a Final Order is received or for a period of 8 (Eight) Years whichever is higher. Pleadings shall be retained for a period of 8 (Eight) Years or till the matter has been disposed off, whichever is higher.

8. LOCATION OF ARCHIVAL

The archived folder shall be located on the website of the Company.

9. AUTHORITY FOR APPROVAL OF POLICY

The Board shall have the authority for approval of this policy in pursuance to these Regulations.

10. AUTHORITY TO MAKE ALTERATIONS TO THE POLICY

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

11. RESPONSIBILITY TO REVIEW THE WEBSITE AND ARCHIVED DOCUMENTS

In accordance with the provisions of Regulation 46 (3), the Authorised Person shall ensure to update any change in the content of the website within two working days of such change. The Authorized person of the Company shall be responsible for periodic and ongoing review of the contents of the website and keep the information up to date.

The contents with respect to Events or Information as disclosed under Regulation 30(8) of the Regulations would be moved to the archived folder after a period of 5 years from the date on which such disclosures/ announcements were made.

The contents with respect to Events or Information other than those mentioned above shall be moved to archived folder at such frequency as may be decided by the Authorised person subject to the provisions under Applicable Law, if any.

12. REMOVAL OF ARCHIVED DOCUMENTS

The archived documents will be available in the archived folder for a period of three years. After the expiry of three years, the archived disclosures/ announcements shall be removed from the website of the Company.

13. ACCESS TO THE ARCHIVED DOCUMENTS

The contents of archived folder, on the website of the Company shall not be accessible to public.

For DCW LIMITED

Managing Director

Chief Executive Officer

Dated:

Place: