



ARCHIVAL POLICY

VINDHYA TELELINKS LIMITED

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VINDHYA TELELINKS LIMITED

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1. PREAMBLE AND PURPOSE

Regulation 30 (8) of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015, mandates the listed companies to frame a Policy and upload the same on its website, laying down the framework for disclosure on information and their archival on the Company's website.

The Company is committed to establish and maintain information that meets its business needs, accountability requirements and stakeholder expectations.

The Policy aims at nourishing the transparency, accountability and better relationship with stakeholders.

2. RATIONALE

This Policy emphasizes on the importance of preservation of the records and disclosures hosted on the website of the Company for making information accessible to the general public for taking well-informed decisions. Both electronic and paper documents that are needed to be disclosed are generally backed by some regulatory requirement and are thus, subject to be handled with due care. Therefore, electronic records must be managed as a part of a comprehensive record keeping program. The Policy has been framed with an objective of maintenance of the Company's historical data and records hosted on the website at one place, in known locations for making it accessible to staff, shareholders of the Company and its prospective investors.

3. OBJECTIVE

Since the disposition phase of the records is critically important from the perspective of legal and economical maintenance of records, it becomes imperative to retain those records having long term value to the Archives for permanent storage and to suitably deal with the records having relevance for a specific period of time. Through this Policy, the Company seeks to preserve and manage the records in a consistent and logical manner to achieve the below mentioned objectives:

- to meet the legal standards for protection, storage, and retrieval of the record;
- to use the space on the website efficiently; and
- minimize the cost of record retention.

4. SCOPE

As per this Archive Policy:

- (i) every kind of information which is material for the business affairs of the Company and has been disclosed to the Stock Exchanges shall be hosted on the website of the Company for the minimum period of 5 years from the date of occurrence/happening of an event or transaction;

- (ii) every kind of information which is mandated to be disclosed on the website as per the provisions of any applicable statutes, rules and regulations shall be hosted on the website of the Company for such time period as specified under the applicable statutes, rules and regulations;
- (iii) Thereafter on expiry of the stipulated periods, in the interest of stakeholders at large and on the basis of appraisal process, the Compliance Officer may opt any of the following strategies:
 - (a) extend the time period of hosting of the information on the Company's Website; or
 - (b) dispose off the information if it is of no relevance; or
 - (c) get it stored in the Archive section for future reference, if it is not relevant to host but have long-term retention value.
- (iv) If after the Appraisal process, any document/information is considered to be of value and decided to be kept on the website, such information and disclosures shall remain in public domain at the Archive section on the website of the Company after stipulated period of 5 years from the time when the said information and disclosures are being hosted on the Company's website or such other period as specified by the applicable statutes, whichever is higher.

5. COMPLIANCE OFFICER

The Company Secretary of the Company shall be the Compliance Officer of the Company.

6. AUTHORITY & RESPONSIBILITY

It shall be the responsibility of the Compliance Officer to have the Archive section on the website updated from time to time, by having the records placed therein. The authority for determining the time within which the records will be moved to the Archive section shall be decided by the Compliance officer. The records shall be moved to the Archive section only after the approval of the Compliance Officer.

7. INTERPRETATION

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy until such time as this Policy is updated to conform to the law, rule, regulation or standard.

8. REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.