

ARCHIVAL POLICY

[Pursuant to provisions of Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

OF

NEWTIME INFRASTRUCTURE LIMITED

PREFACE:

The Board of Directors (the 'Board') of Newtime Infrastructure Limited (the 'Company') has adopted the Archival Policy (the 'Policy').

This policy is formulated in pursuance of Regulation 30(8) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations').

AUTHORITY FOR APPROVAL OF POLICY:

The Board shall have the authority for approval of this policy in pursuance to the Listing Regulations. This authority has been granted *via* the Listing Regulations.

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 Listing Regulations.

ARCHIVAL POLICY:

As per the provisions of Regulation 30(8) of Listing Regulations:

'The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.'

In accordance with the aforesaid provisions read with Regulation 46 of the Listing Regulations, the Company shall ensure to maintain a functional website containing the basic information of the Company.

The basic information/documents of the Company (listed in **Annexure - A**) which are permanent in nature shall be hosted on the website till perpetuity. The other details/information in the nature of announcements or any other form (listed in **Annexure - B**) filed with Stock Exchanges to be disseminated for a period of 5 years and thereafter the same shall be archived so as to be available for retrieval for a further period of 1 year.

The Company shall ensure that the contents of the website are correct. Any update / any change in the content of the website to be updated within two working days from the date of such change in content.

The Archival policy to be disseminated on the website of the Company.

ANNEXURE - A

Information/ Documents to be permanently hosted on the website

| Sr. No. | Documents |
|----------------|---|
| 1. | Details of its business |
| 2. | Composition of various Committees of Board of Directors |
| 3. | Code of Conduct of Board of Directors and Senior Management Personnel |
| 4. | Details of establishment of Vigil Mechanism/ Whistle Blower policy |
| 5. | Policy on dealing with Related Party Transactions |
| 6. | The email address for grievance redressal and other relevant details |
| 7. | Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances |
| 8. | Terms and conditions of appointment of Independent Directors |

ANNEXURE - B

Information/ Documents to be hosted on the website for a period of five years

| Sr. No. | Documents |
|---------|--|
| 1. | Details of familiarization programmes imparted to independent directors including the following details: <ul style="list-style-type: none"><li data-bbox="386 494 1383 567">i. number of programs attended by independent directors (during the year and on a cumulative basis till date),<li data-bbox="386 567 1383 639">ii. number of hours spent by independent directors in such programmes (during the year and on cumulative basis till date), and<li data-bbox="386 639 1383 674">iii. other relevant details |
| 2. | Financial information including: <ul style="list-style-type: none"><li data-bbox="386 709 1383 782">i. notice of meeting of the board of directors where financial results shall be discussed<li data-bbox="386 782 1383 854">ii. financial results, on conclusion of the meeting of the board of directors where the financial results were approved<li data-bbox="386 854 1383 935">iii. complete copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report etc. |
| 3. | Shareholding pattern |
| 4. | Copies of advertisements published in Newspapers: <ul style="list-style-type: none"><li data-bbox="386 1005 1383 1077">i. notice of meeting of the board of directors where financial results shall be discussed<li data-bbox="386 1077 1383 1150">ii. Financial results, as specified in regulation 33, along-with the modified opinion(s) or reservation(s), if any, expressed by the auditor.<li data-bbox="386 1150 1383 1257">iii. statements of deviation(s) or variation(s) as specified in sub regulation (1) of regulation 32 on quarterly basis, after review by audit committee and its explanation in directors report in annual report<li data-bbox="386 1257 1383 1292">iv. Notices given to shareholders by advertisement. |
| 5. | Disclosures made on the website of all such events or information which has been disclosed to the stock exchanges under Regulation 30 of the Listing Regulations. |