

# **ARCHIVAL POLICY**

## **1. INTRODUCTION**

This Archival Policy for material event/material information disclosed to the stock exchanges ("Policy"), as per Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015("LODR"), outlines the methodology for the archival of material events/ material information that have been disclosed to the stock exchanges by **Newtime Infrastructure Limited**. ("Company").

## **2. POLICY OBJECTIVE**

This Policy deals with the retention and archival of the corporate records of Newtime Infrastructure Limited and all its subsidiaries (hereafter, referred as the "Company").

## **3. DEFINITIONS**

"**Board of Director**" or "Board" means the Board of Directors of Newtime Infrastructure Limited, as constituted from time to time.

"**Policy**" means Document Retention & Archival Policy.

"**Corporate records**" mean all paper or electronic records that are produced by an employee, including but not limited to, memoranda, contracts, agreements, e-mails and expense records.

## **4. POLICY**

### **a) Archival Policy for submissions made to Stock Exchanges**

Documents submitted to stock exchanges for dissemination to stakeholders will be retained on the website of the Company for a minimum period of five years or such higher period as may be prescribed by any applicable laws. The Document may thereafter be shifted to the Archive Section of the website, where it shall be retained for such as may be decided by the Company Secretary in consultation with CEO / ED., after which it may be removed from the website.

Notwithstanding the above, the Management shall have the discretion to host any of such documents on the website of the Company for such additional period as the management may deem fit on a case-to-case basis.

### **b) Archived Policy for other information hosted on the website pursuant to applicable legislations:**

All other documents/ information which are hosted on the website of the Company pursuant to any Law/ Regulation/ Guideline as may be applicable to the Company from time to time, shall be

retained on the website for such minimum period of time as may be specified under such Law/ Regulation/ Guideline. The Document may thereafter be shifted to the Archive Section of the website, where it shall be retained for such period as may be decided by the Company Secretary in consultation with CEO / ED., after which it may be removed from the website.

Notwithstanding the above, the Management shall have the discretion to host any of such documents on the website of the Company for such additional period as the management may deem fit on a case to case basis.

**c) Archived Policy for other information voluntarily hosted on the website:**

All information/ documents hosted on the website of the Company voluntarily by the management, shall be retained on the website/ Archive section for such period of time as may be deemed fit at the absolute discretion of the Management.

Additionally, there are certain types of records that need to be retained for a longer period of time, as identified below:

**Board of Directors Records:** Minutes of meetings of the Board of Directors shall be maintained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for not less than three (3) years.

**Press Releases & Public Filings:** All press releases and publicly filed documents shall be maintained in perpetuity. All events and press releases filed with the stock exchanges shall be maintained for not less than five (5) years on the website of the company.

**Books of Accounts and Tax Records:** Books of accounts and Tax records should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used.

**Employment Records:** The Company maintains personnel records that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment, such as actions taken against personnel. These records should be retained for a period of three (3) years following the cessation of employment.

**Intellectual Property Records:** Document relating to the development and protection of the intellectual property rights should be maintained for the life of such intellectual property right.

**Contracts & Agreements:** Executed copies of all Contracts & Agreements entered into by the Company should be retained for at least three (3) years following the expiry or termination of the contracts.

The Company maintains safety procedure to ensure proper maintenance of all documents and records. In the event of any accident incident, immediate action plan to rescue or prevent further damage to the records is defined. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Company has made appropriate provision for the backup of its digital collections, including the provisions of offsite security copies. The backup copies are actively maintained to ensure their continued viability.

In case of doubts and for any clarification regarding the Policy, the Legal Department/Compliance Officer may be consulted.

**5. GENERAL AUTHORIZATION**

The Management of the Company is authorized to periodically review the policy and make such changes as considered necessary.

**6. REVIEW & DISSEMINATION OF POLICY**

The policy should be reviewed periodically by the senior management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The senior Management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.

The policy shall be uploaded on the website of the Company.