



SHARDA MOTOR INDUSTRIES LIMITED

SMIL ARCHIVAL POLICY

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

[Approved by the Board of Directors on 06th February' 2026]





SMIL ARCHIVAL POLICY

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A. PREAMBLE:

In terms of Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under regulation 30 of regulations, and such disclosures shall be hosted on the website of Company for a minimum period of five years and thereafter as per the *archival policy* of Company, as disclosed on its website.

In this context the policy on Archival of Documents (“Policy”) is being framed and implemented

B. OBJECTIVE OF THE POLICY:

Any disclosure of events or information which has been submitted by the Company to the Stock Exchanges under Regulation 30 of the said Regulations will be hosted on the website of the Company for a minimum period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years.

- **Classification of Records:** All records and disclosures shall be classified based on their nature, sensitivity, and regulatory requirement. The categories shall include, but are not limited to:
 - **Financial Records:** Annual reports, quarterly financial statements, audit reports.
 - **Corporate Governance Records:** Board resolutions, committee minutes, policies.
 - **Regulatory Disclosures:** Events or information required under SEBI Regulations and other statutory filings.
 - **Operational Records:** Contracts, agreements, correspondence relevant to company operations. Each class of records will be handled and archived according to its classification, retention period, and sensitivity level.

- **Storage and Preservation:** All archival records shall be stored in a secure, reliable, and retrievable manner. Digital records must be backed up on redundant storage systems with restricted access. Physical records, if retained, shall be stored in a fireproof, climate-controlled environment. Preservation measures shall ensure that records remain intact, legible, and usable for the duration of their retention period.

- **Access and Retrieval:** Access to archived records shall be limited to authorized personnel based on role and responsibility. Retrieval requests must be formally documented and approved by the Head of Compliance or an appointed custodian. Access logs shall be maintained to monitor who accesses or modifies archived records, ensuring traceability and accountability.



- Disposal and Destruction: Records that have exceeded their retention period shall be disposed of in a secure manner, preventing unauthorized access or misuse. Digital records shall be permanently deleted using secure erasure methods, and physical records shall be shredded or incinerated. Disposal shall be documented, specifying the record type, date of destruction, and responsible personnel.

- Roles and responsibilities
 - Board of Directors: Approves the archival policy and any significant amendments.
 - Head of Compliance / Company Secretary: Ensures policy implementation, regulatory compliance, and oversees archival processes.
 - Department Heads: Identify and categorize records in their department and ensure timely submission for archiving.
 - IT / Records Management Team: Maintains the archival storage systems, backups, and secure access controls. Responsibilities for each category of records shall be clearly assigned and periodically reviewed.

C. AMENDMENTS TO THE POLICY:

The Board shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this Policy. The Board reserves the right to amend this Policy from time to time based on changing requirements as prescribed by SEBI/Stock Exchange(s) or any other appropriate Statutory Authority.

If case of any inconsistency between this Policy and the Indian regulations, the requirements of the Indian regulations shall prevail.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities including SEBI, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

