

# **Archival Policy**

## **Proaim Enterprises Limited**

### **Background**

The Securities and Exchange Board of India has notified SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015 on September 2, 2015 to be effective from December 1, 2015.

The Proaim Enterprises Limited (“Proaim Enterprises” or the “Company”) maintains a website [www.shreenathcommercial.com](http://www.shreenathcommercial.com) which inter alia contains details of the Company’s business and Values; its Board and various Committee; its corporate policies, its Corporate Governance.

The website also hosts information mandated by statutory authorities under various laws, including the Companies Act, 2013 (the “Act”) as amended from time to time and the Securities and Exchange Board Of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Regulations”), as amended from time to time.

Regulation 30(1) of the Regulations requires every listed entity to make disclosures of any events or information which, in the opinion of the board of directors of the listed company, is material.

Regulation 30(8) of the Regulations requires that a 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 view of the above, the Company has framed this Archival Policy to determine the period for which the information required by the Company to be disclosed on its website, will be hosted on the website and the period for which it will be archived thereafter.

### **Scope of the Policy**

This Policy provides a framework for ensuring that information relating to the Company is adequately disclosed on its website as required by law and archived for a specified period as per section 4, to facilitate retrieval, if required.

### **Disclosure of information on website**

The respective Functional Heads will be responsible for ensuring that the information supplied to the Corporate Communications Department for uploading on the Company’s website is correct, complete and kept current at all times. They will be responsible for ensuring that any changes required to be made to keep the information updated is promptly conveyed to the Corporate

Communications Department, in any case not later than one working day. 3.2 The Company Secretary or Compliance Officer appointed under the Regulations will be responsible for ensuring that all information required to be statutorily disclosed on the Company's website is promptly provided to the Corporate Communications Department for uploading on the website and that the same is correct, complete and kept updated at all times. Any change in the content of its website shall be updated by the Corporate Communications Department within two working days from the date of such change in content.

## Archival period

### For events or information disclosed under Regulation 30:

- ✓ All events or information disclosed under Regulation 30 to the Stock Exchanges on which the Company is listed and hosted on the Company's website shall be available on the Company's website for a period of five years from the date of uploading of the same on the website.
- ✓ However, based on feedback over a period of time, if the disclosure requires a longer storage, the same will be considered appropriately.

### For disclosures made under other statutes/legislations:

- ✓ All information required to be uploaded on the Company's website in pursuance of any other statute / legislation / regulation shall be hosted on the Company's website for such period as many are mandated by that statute / legislation / regulation.
- ✓ In cases where the concerned statute / legislation / regulation does not prescribe any period, the required data shall be hosted on the website for a maximum period of two years from the date of uploading or till it is relevant.
- ✓ After a period as above has elapsed since the date of uploading of the information on the Company's website, the same may be removed from the website.

## Review of policy

In case there are regulatory changes requiring modifications to the policy, the policy shall be reviewed and amended with the due approval of the management. However, the amended regulatory requirements will supersede the policy till the time policy is suitably amended.

**The Indicative List of Information, whether material or not, which shall be published on the website of the company and would be subject to the archival policy of the company, are as under:**

- Ω Acquisition(s) (including agreement to acquire), Scheme of arrangement (amalgamation/ merger/ demerger/restructuring), or sale or disposal of any unit(s), division(s) or subsidiary of the listed entity or any other restructuring.
- Ω Issuance or forfeiture of securities split or consolidate on of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.
- Ω Revision in Rating(s).
- Ω Outcome of Meetings of the board of directors: The listed entity shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting, held to consider the following:
  - dividends and/or cash bonuses recommended or declared or
  - the decision to pass any dividend and the date on which dividend shall be paid/dispatched;
  - any cancellation of dividend with reasons thereof;
  - the decision on buyback of securities;
  - the decision with respect to fund raising proposed to be undertaken
  - increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched;
  - reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;
  - short particulars of any other alterations of capital, including calls;
  - financial results;
  - Decision on voluntary delisting by the listed entity from stock exchange(s).
- Ω Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the listed entity), agreement(s)/treaty (ies)/contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.
- Ω Fraud/defaults by promoter or key managerial personnel or by listed entity or arrest of key managerial personnel or promoter.
- Ω Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer , Company Secretary etc.), Auditor and Compliance Officer.
- Ω Appointment or discontinuation of share transfer agent.
- Ω Issuance of Notices, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the listed entity.

**The Indicative list of Information, which if considered material in nature, shall be published on the website of the company and would be subject to the archival policy of the company are as under:**

- Ω Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
- Ω Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing
- Ω Tie-up, adoption of new lines of business or closure of operations of any unit/division (entirety or piecemeal).
- Ω Capacity addition or product launch.
- Ω Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
- Ω Agreements (viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.
- Ω Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
- Ω Effect(s) arising out of change in the regulatory framework applicable to the listed entity
- Ω Litigation(s) / dispute(s) / regulatory action(s) with impact.
- Ω Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
- Ω Options to purchase securities including any ESOP/ESPS Scheme.
- Ω Giving of guarantees or indemnity or becoming a surety for any third party.
- Ω Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.