

V.R. WOODART LIMITED

DOCUMENT RETENTION AND ARCHIVAL POLICY

1. BACKGROUND

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The Listing Regulations came into force from December 1, 2015. The Listing Regulations mandates listed entities to formulate a Policy for preservation and archiving of documents. It is in this context that the Document Retention and Archival Policy (hereinafter referred as “the Policy”) is being framed and implemented.

2. OBJECTIVE

The corporate records of V.R. WOODART Limited (hereinafter referred as “the Company”) are important assets. The objective of the Policy is to classify the documents in two categories i.e. (i) documents which need to be preserved permanently and (ii) documents which need to be preserved for minimum period of 8 years after completion of relevant transaction. The Company expects all employees to fully comply with the Policy.

3. CLASSIFICATION

Documents which need to be preserved permanently

The Board of Directors shall decide necessity of preservation of documents permanently from time to time as required under the Act and Regulation.

I. the following documents/ records maintained shall be preserved permanently

- a. Financial Statements, duly signed annual reports.
- b. Annual Returns filed with the RoC.
- c. Minutes of all the General Meetings.
- d. Disclosures made under the SEBI Insider and Takeover Regulations and the SEBI (LODR) Regulations, 2015/Listing agreement to the Stock Exchange from time to time.
- e. Memorandum and Articles of Association of the Company as may be amended from time to time.
- f. Shareholders and Joint Venture agreement.
- g. Letter of Offer related to public issue, right issue, further issue, buyback offer, etc.
- h. Returns and filings under Income tax, Sales Tax, Excise, VAT, Service Tax, Customs, FEMA, and other statutes.

- i. any others, if Board of Directors may deem fit.

Documents with preservation period of not less than eight years after completion of the relevant transaction

- II. the following documents/ records maintained shall be preserved for a period of 8 years after completion of relevant transaction
 - a. Notice of the Board meetings given to the Stock Exchange for considering matters relating to pre-intimations required to be submitted to the Stock Exchange.
 - b. Date for the Book Closures and Record dates for various purposes as may be decided by the Company from time to time.
 - c. Quarterly and half yearly and annual financial results of the Company
 - d. Quarterly Shareholding Pattern including details for pledge of shares and any changes therein.
 - e. Results of the E-Voting, General Meetings, Postal Ballot etc.
 - f. List of Unpaid Dividend to the shareholders
 - g. Change in the constitution of the Board of directors, KMP, Compliance Officer, Auditors, Secretarial Auditors, Share Transfer Agent.
 - h. Agreement with the Share Transfer Agent, Depositories, etc.
 - i. Any price Sensitive Information's given or provided to the Stock Exchange under Regulation 30 of the SEBI (LODR) Regulations, 2015.
 - j. Recommendation and payment of dividend to the shareholders
 - k. Details of the Complaints received and resolved by the Company.
 - l. Corporate Governance Report submitted to the Stock Exchange on quarterly and annual basis.
 - m. Copy of the orders issued by the SEBI or Stock Exchanges relating to securities listed with the Stock Exchanges.

4. DOCUMENTS TO BE HOSTED ON WEBSITE

The Company shall host on its website, information and documents which are required to be hosted as per the Companies Act, 2013 and Rules framed thereunder, SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (the "Regulations") and other applicable laws, Rules and Regulations.

The Company shall host the above information and documents on its website for a continuous period of five years from the date of hosting.

5. ARCHIVAL OF DOCUMENTS

After the hosting period of five years is over, the Company shall archive these information and documents for a period of five years. Thereafter, the information/documents may be deleted permanently after obtaining approval from the Managing Director or the Company Secretary or Chief Financial Officer. Provided however, if the size of documents is very large or it becomes expensive to archive certain documents, then such documents may be removed/deleted from archives after taking prior approval of Managing Director or the Company Secretary or Chief Financial Officer.

6. REVIEW AND AMENDMENT

The Board of Directors will review the Policy and make revisions as may be required.

7. DISCLOSURE OF THE ARCHIVAL POLICY

The Policy shall be uploaded on the Company's website for public information.