



VAS INFRASTRUCTURE LTD.

CIN NO : L74999MH1994PLCO76538

Regd. Off. : Plot No. 757/758, Jwala Estate, Soniwadi, Near Kora Kendra, S. V. Road, Borivali (W), M - 92. **T. :** 022-2899 7506 / 3234 / 2658 **Fax :** +91-22-2899 7806
Email : vasinfrastuctureltd@yahoo.com # **Website :** www.vasinfrastuctureltd.com

ARCHIVAL POLICY

*[Pursuant to Regulation 30(8) of Securities and Exchange Board of India,
(Listing Obligations and Disclosure Requirements) Regulations, 2015]*

*The Policy has been approved and adopted by the Board of Directors of the
Company held on May 30, 2019, and the same are effective from*

April 1, 2019



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Clause 1- Policy Statement:

This Policy has been prepared pursuant to Regulation 30 (8) of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015, which mandates the listed companies to frame a Policy and upload the same on its website, laying down the framework for disclosure on information and their archival on the Company's website.

The Company is committed to establish and maintain information that meets its business needs, accountability requirements and stakeholder expectations.

The Policy aims at nourishing the transparency, accountability and better relationship with stakeholders

Clause 2- Definitions:

Archive: A collection of historical documents or records providing information accumulated over the course of an organization's lifetime. It can also be termed as 'Corporate Memory'.

Archives: It is referred to a repository where the records are kept.

Archivist: Archivist is a person who on a time to time basis reviews the records and decides upon the requirement of hosting information on the web portal of the Company. The Compliance Officer and Chief Financial Officer of the Company shall act as the Archivists.

Electronic records: Records communicated and maintained by means of electronic equipments.

Records: A "record" is a database of disclosed information or events in any format or medium that has been created by or for the Company, or received by the Company in connection with the transaction of the organization's affairs and operations.

Clause 3- Rationale of the Policy:

This Policy emphasizes on the importance of preservation of the records and disclosures hosted on the website of the Company for making information accessible to the general public for taking well-informed decisions. Both electronic and paper documents that are needed to be disclosed are generally backend by some regulatory requirement and are thus, subject to be handled with due care. Therefore, electronic records must be managed as a part of a comprehensive record keeping program. The Policy has been framed with an objective of maintenance of the Company's historical data and records hosted on the website at one place, in known locations for making it accessible to staff, shareholders of the Company and its prospective investors.



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Clause 4- Objective of the Policy:

Since the disposition phase of the records is critically important from the perspective of legal and economical maintenance of records, therefore, it becomes imperative to retain those records having long term value to the Archives for permanent storage and to suitably deal with the records having relevance for a specific period of time. Through this Policy, the Company seeks to preserve and manage the records in a consistent and logical manner to achieve the below mentioned objectives:

- ✦ to meet the legal standards for protection, storage, and retrieval of the record;
- ✦ to use the space on the website efficiently; and
- ✦ to minimize the cost of record retention.

Clause 5- Scope of the Policy:

In General, as per this Archive Policy:

- 1) every kind of information which is material for the business affairs of the Company and has been disclosed to the Stock Exchanges shall be hosted on the website of the Company for the *minimum period of 5 years from the date of occurrence/ happening of an event or transaction*;
- 2) every kind of information which is mandated to be disclosed on the website as per the provisions of any applicable statutes, rules and regulations shall be hosted on the website of the Company for such time period as specified under the applicable Statues, rules and regulations;
- 3) Thereafter on expiry of the stipulated periods, in the interest of stakeholders at large and on the basis of appraisal process, the Compliance Officer may opt any of the following strategies:
 - (a) extend the time period of hosting of the information on the Company's Website; or
 - (b) dispose off the information if it is of no relevance; or
 - (c) get it stored in the Archives section for future reference, if it is not relevant to host but have long-term retention value.
- 4) If after the Appraisal process, any document/ information is considered to be of value and decided to be kept on the website, such information and disclosures shall remain in public domain at the Archives section on the website of the Company after stipulated period of 5 years from the time when the said information and disclosures are being hosted on the Company's website or such other period as specified by the applicable statutes, whichever is higher.



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The Board of Directors, Compliance Officer and staff of the Company shall be familiar with this Policy.

Clause 6- Record Appraisal:

Determining the value of a record series is known as "appraisal". Appraisal is the process by which archivists determine the administrative, legal, and fiscal value as well as the historical and long-term research value of records. Once the value of a record series has been determined, a realistic retention period can be assigned to it. Appraisal can take place at any point during a record series' life cycle, but is most frequently done when the records become inactive.

Clause 7- Appraisal Consideration:

Some of the considerations taken into account during the appraisal process include:

- ⚡ administrative and operational need served by the record;
- ⚡ legal and fiscal regulations governing retention;
- ⚡ historical significance;
- ⚡ economic advantage of moving the records from high cost office storage to low cost records storage space or direct disposal;
- ⚡ identification of materiality of records after a stipulated time period and its impact thereon.

Clause 8- Compliance Officer:

Mr. Hariram K. Bijlani, Company Secretary shall be the Compliance Officer of the Company.

Clause 9- Authority & Responsibility:

It shall be the responsibility of the Compliance Officer and the Chief Financial Officer, as designated by the Board of Directors of the Company, to have the Archive section on the website updated from time to time, by having the records placed therein. The authority for determining the time within which the records will be moved to the Archive section shall be decided by the Compliance officer and reported to the Board of Directors of the Company, at every ensuing Board Meeting. The records shall be moved to the Archives only after the approval of the Compliance officer.

Clause 10- Effective date and Policy Enforcement:

The Policy has been approved and adopted by the Board of Directors of the Company in their meeting held on 29th May, 2019, and shall be with immediate effect.



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Clause 11- Review:

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments.