

VARUN MERCANTILE LIMITED
POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS:

1. Scope

A policy on preservation of Documents would ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

2. Coverage

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

3. Classification

The preservation of Documents shall be done in the following manner:

- a. Where there is a period for which a Document is required to be preserved as per applicable law, for the period required by Applicable Law.
- b. Where there is no such requirement as per Applicable Law, then for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance. Provided that generally speaking, a Document may be preserved for a period of 8 years from the date on which the Document was originated.

4. Modes of preservation

4.1 The Documents may be preserved in Physical form or Electronic Form.

4.2 The officer of the Company required to preserve the Document shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law

4.3 The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

4.4 The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

5. Custody of the Documents

5.1 Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person.

5.2 Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

6. Authority to make alterations to the Policy

The Board/its committee is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

7. Destruction of Documents

7.1 Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents.

7.2 The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. 7.3 A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.

7.4 The entries in the register shall be authenticated by the Authorised Person.

8. Conversion of the form in which the Documents are preserved

8.1 The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

8.2 This will be done after obtaining prior approval of the authorized person.

9. Authenticity

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

10. Archival of Documents:

After the hosting period of five years is over, thereafter, such disclosures shall be kept in the archives of the Company for a period of 2 years.

Thereafter, the information/documents may be deleted / removed from the website after obtaining approval from the Authorised Person.

10. Interpretation

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.