

VINTRON INFORMATICS LIMITED

ARCHIVAL POLICY

1. BACKGROUND

In terms of Regulations 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Regulations'), a listed entity is required to host on its website, all the material events/ information as disclosed to the stock exchange(s) for a period of five years and thereafter in terms of the archival policy of such entity as disclosed on the website.

Accordingly, VINTRON INFORMATICS LIMITED ('Company') has formulated this Archival Policy ('Policy') for ensuring compliance with the provisions of Regulation 30(8) of the Regulations for protection, maintenance and archival of the Material Events or Information (defined below) disclosed to the stock exchange(s) and hosted on its website. Additionally, the Policy shall also include such other Events or Information which are required to be hosted on the website of the Company in terms of other Applicable Laws, if any, by the Authorized Person.

2. DEFINITIONS –

- 2.1 'Applicable Law' means any law, rules, regulations, circulars, guidelines, standards etc. under which disclosure of Material Events or Information, or other events or information on the website has been prescribed.
- 2.2 'Archived documents' mean details of Material and other Events or Information as placed or maintained in the archived folder.
- 2.3 'Authorized Person' means any one of the following:
 - a) Chairman & Managing Director (CEO);
 - b) Whole Time Director;
 - c) CFO ;
 - d) Company Secretary; and
 - e) Any other person as may be decided by the Board of Directors of the Company from time to time.
- 2.4 'Company' means VINTRON INFORMATICS LIMITED.
- 2.5 'Material Events or Information' refers to the information/ events that are required to be disclosed on the website of the Company in terms of Regulation 30(8) of the Regulations and in terms of the policy to determine Material Events or Information of the Company.
- 2.6 'Policy' means the Policy framed by the company in terms of Regulation 30 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

2.7 'Regulations' means the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

3. SCOPE OF THE POLICY

This policy covers archival of all Material Events or Information or other events or information which has been disclosed to Stock Exchange(s) and hosted on the website of the Company in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Applicable Laws.

4. ARCHIVAL OF MATERIAL AND OTHER EVENTS/INFORMATION

The archival of material & other events or information as disclosed or hosted on the website shall be done in the following manner:

- a) Material & Other Events or Information as disclosed under Regulation 30(8) of the Regulations will be made available for a period of 5 years from the date on which such disclosures/ announcements are made to the Stock Exchanges. Thereafter, such event / information will be archived for a period of 1 year. After the expiry of 1 year, the archived disclosures / announcements shall be removed from the website of the Company.
- b) Where there is a period for which a Document is required to be archived as per any other applicable Law, for the period required by such applicable Law.

5. LOCATION OF ARCHIVED FOLDER

The archived folder shall be located on the website of the Company.

6. AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not 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
