



**ATISHAY LIMITED**

**POLICY FOR PRESERVATION OF DOCUMENTS  
AND ARCHIVAL OF DOCUMENTS**

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## **1. PREAMBLE**

Securities and Exchange Board of India has notified Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. These regulations require every listed Company to disclose on its website all such events or information which has been disclosed to the Stock Exchange(s) 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.

## **2. SCOPE**

This policy shall govern the disclosure and archival of such contents only which have been disclosed on the website of the Company pursuant to the compliance with the above mentioned Regulations and which are disclosed with stock exchanges. Other contents displayed / hosted on the website shall be out of purview of the Policy and can be archived / deleted as per the requirement of the content.

## **3. OBJECTIVES OF THE POLICY**

The main objective of this policy is to ensure that all the documents, disclosures made to the stock exchanges pursuant to the Regulations are hosted on the website and transferred to the Archives folder of the Website of the Company after the completion of five years from the date of disclosure or event.

The major objectives of the policy are:

- Identification of Information, documents, events, etc. which are required to be disclosed on the website of the Company.
- Ensuring that all the information is disclosed at the relevant link and there is unanimity in the same every time.

- Ensure that all the information, documents, events disclosed on the website of the Company, unless otherwise specified in the Act, shall remain on the website for the five years from the date of disclosure.
- After completion of five years of disclosure of the respective documents, shall be moved to the respective archives folder on the website of the Company.
- Documents which are required to be hosted on the website for a particular period, shall be deleted after the due date, therefore, it shall not be saved to archives folder.
- Certain documents like Policies, Codes of Conduct and other documents which are required to be continuously displayed on the website, shall not be archived.

#### 4. DEFINITIONS

1. **“Act”** means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;
2. **“Regulations”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;
3. **“Company”, “This Company”, “The Company”, “Company”** wherever occur in the policy shall mean “Atishay Limited”.
4. **“Board of Directors” or “Board”**, means the collective body of the Directors of the company;
5. **“Policy” or “This Policy”** means, “Website Content Archival Policy.”
6. **“Website”** means website of the Company i.e. [www.atishay.com](http://www.atishay.com)

## **5. INTERPRETATION**

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, Listing Agreement and/or any other SEBI Regulation(s) as amended from time to time.

## **6. GUIDELINES**

The Company being listed on BSE ("Stock Exchange"), regularly sends various information, financial statements, notices and other disclosures, as required under listing agreement to Stock Exchanges where securities of the Company are listed. As required under the Act and the Listing agreement the same are also displayed and hosted on the website of the Company.

Regulation 46 read with Regulation 62 of Regulations requires the listed Companies to maintain a functional website containing basic information about the Company and other prescribed details.

Regulation 30(8) requires the Listed Companies to 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 Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.

## **7. POLICY**

The documents, information, disclosures, notices, policies as provided under the Regulations and the Act, which are required to be disclosed on the website, shall be uploaded on the website of the Company. The website of the Company shall be reviewed on regular intervals for ensuring that all the above mentioned disclosures are available on the website of the Company as required.

These disclosures, unless otherwise mentioned in the Act itself, shall be hosted on the website for the specified period and thereafter shall be moved/ transferred to Archives folders under the respective heads / sub-folders, in a way so that these can be searched easily as and when required by any person. The documents/disclosures shall be kept in the archive folders till such time as may be required by law.

Detailed list of information to be uploaded and updated on website of the Company is enclosed as Annexure forming part of this policy.

## 8. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

## 9. AMENDMENT TO THIS POLICY

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. Modification may be necessary, among other reasons, to maintain compliance with local, state, central and federal regulations and/or accommodate organizational changes within the Company. However, no such amendment or modification will be binding on the Employees and Directors unless the same is notified to them in writing.

Any subsequent amendment/modification in the SEBI Listing Regulations, Companies Act, 2013 (and the rules framed thereunder) and/or applicable laws in this regard shall automatically apply to this Policy.

## 10. DISCLOSURES

The updated policy shall be continuously hosted on the website of the Company.

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## ANNEXURE

### **A) THE FOLLOWING INFORMATION SHALL BE UPLOADED ON THE WEBSITE AND SHALL BE UPDATED WITHIN TWO WORKING DAYS FROM THE DATE OF OCCURANCE OF CHANGE**

1. Details of Company business.
2. Terms and conditions of appointment of Independent Directors.
3. Composition of various committees of Board of Directors.
4. Code of conduct of Board of Directors and Senior Management Personnel
5. Details of establishment of Vigil Mechanism/ Whistle Blower policy
6. Criteria of making payments to non -executive directors , if the same has not been disclosed in annual report
7. Policy on dealing with related party transactions
8. Policy for determining 'material' subsidiaries;
9. Details of familiarization programmes imparted to Independent Directors.
10. Email address for grievance redressal and other relevant details.
11. Contact information of the designated officials who are responsible for assisting and handling investor grievances;
12. Financial information including:
  - i. notice of meeting of the board of directors where financial results shall be discussed;
  - ii. financial results, on conclusion of the meeting of the Board of Directors where the financial results were approved;
  - iii. Complete copy of the annual report including balance sheet, profit and loss account, director's report, corporate governance report etc.

13. Shareholding pattern.
14. Details of agreements entered into with the media companies and/or their associates, etc.
15. Schedule of analyst or institutional investor meet and presentations made to analysts or institutional investors simultaneously with submission to stock exchange.
16. New name and the old name of the Company, for a continuous period of one year, from the date of the last name change, if applicable.
17. Items in sub -regulation (1) of regulation 47.
18. All credit ratings obtained by the entity for all its outstanding instruments, updated immediately as and when there is any revision in any of the ratings.
19. Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year, uploaded at least 21 days prior to the date of the annual general meeting which has been called to inter alia consider accounts of that financial year.
20. Any other items or information as may be specified by SEBI LODR from time to time.

**B) THE FOLLOWING INFORMATION SHALL BE UPLOADED ON THE WEBSITE AS SOON AS IT IS DISCLOSED TO STOCK EXCHANGES AND SHALL BE ARCHIVED AFTER A PERIOD OF FIVE YEARS:**

1. 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.

Explanation. - For the purpose of this sub -para, the word 'acquisition' shall mean,-

- i) acquiring control, whether directly or indirectly; or,
  - ii) acquiring or agreeing to acquire shares or voting rights in, a company, whether directly or indirectly, such that -
    - a. the listed entity holds shares or voting rights aggregating to five per cent or more of the shares or voting rights in the said company, or;
    - b. there has been a change in holding from the last disclosure made under sub-clause (a) of clause (ii) of the Explanation to this sub - para and such change exceeds two percent of the total shareholding or voting rights in the said company.
2. Issuance or forfeiture of securities, split or consolidation 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.
3. Revision in Rating(s).
4. 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:
- a. 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;
  - b. any cancellation of dividend with reasons thereof;
  - c. the decision on buyback of securities;
  - d. the decision with respect to fund raising proposed to be undertaken .
  - e. increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched;

- f. 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;
  - g. short particulars of any other alterations of capital, including calls;
  - h. financial results;
  - i. decision on voluntary delisting by the listed entity from stock exchange(s).
5. 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.
6. Fraud/defaults by promoter or key managerial personnel or by listed entity or arrest of key managerial personnel or promoter.
7. Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), Auditor and Compliance Officer.
8. In case of resignation of the auditor of the listed entity, detailed reasons for resignation of auditor, as given by the said auditor, shall be disclosed by the listed entities to the stock exchanges as soon as possible but not later than twenty four hours of receipt of such reasons from the auditor.
9. Resignation of Independent Director including reasons for resignation: In case of resignation of an independent director of the listed entity, within seven days from the date of resignation, the following disclosures shall be made to the stock exchanges by the listed entities:
- i. Detailed reasons for the resignation of independent directors as given by the said director shall be disclosed by the listed entities to the stock exchanges.

- ii. The independent director shall, along with the detailed reasons, also provide a confirmation that there is no other material reasons other than those provided.
  - iii. The confirmation as provided by the independent director above shall also be disclosed by the listed entities to the stock exchanges along with the detailed reasons as specified in sub-clause (i) above.
10. Appointment or discontinuation of share transfer agent.
  11. Corporate debt restructuring.
  12. One time settlement with a bank.
  13. Reference to BIFR and winding-up petition filed by any party / creditors.
  14. Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the listed entity.
  15. Proceedings of Annual and extraordinary general meetings of the listed entity.
  16. Amendments to memorandum and articles of association of listed entity, in brief.
  17. Schedule of Analyst or institutional investor meet and presentations on financial results made by the listed entity to analysts or institutional investors;
  18. The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code:
    - a) Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default;
    - b) Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default;
    - c) Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable ;
    - d) Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code;
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- e) List of creditors as required to be displayed by the corporate debtor under regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;
  - f) Appointment/ Replacement of the Resolution Professional;
  - g) Prior or post -facto intimation of the meetings of Committee of Creditors;
  - h) Brief particulars of invitation of resolution plans under section 25(2)(h) of Insolvency Code in the Form specified under regulation 36A(5) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;
  - i) Number of resolution plans received by Resolution Professional;
  - j) Filing of resolution plan with the Tribunal;
  - m) Approval of resolution plan by the Tribunal or rejection, if applicable;
  - k) Salient features, not involving commercial secrets, of the resolution plan approved by the Tribunal, in such form as may be specified;
  - l) Any other material information not involving commercial secrets
19. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
20. Material Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie -up, adoption of new lines of business or closure of operations of any unit/division (entirety or piecemeal).
21. Material Capacity addition or product launch.
22. Awarding, bagging/ receiving, amendment or termination of awarded/ bagged orders/contracts not in the normal course of business.
23. Material 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.
24. Major 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.
25. Material Effect(s) arising out of change in the regulatory framework applicable to the listed entity .

26. Material Litigation(s) / dispute(s) / regulatory action(s) with impact.
27. Material Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
28. Options to purchase securities including any ESOP / ESPS Scheme.
29. Giving of guarantees or indemnity or becoming a surety for any third party.
30. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
31. Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the listed entity which may be necessary to enable the holders of securities of the listed entity to appraise its position and to avoid the establishment of a false market in such securities.
32. Items in sub -regulation regulation 62
33. Any other disclosures of event/information as specified by the Board from time to time.

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