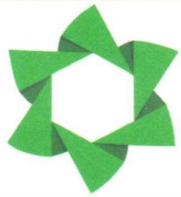


This document intends to sets out the approach for protection, maintenance and archival of the Events or Information

Archival Policy



KIRAN VYAPAR
LIMITED

Approved By: [●] Board of Directors

Policy Owner : [●] Company Secretary and CFO

Subject : Archival Policy	Original Issue Date : 04.11.2015	Effective Date : 01.04.2019
	Revision Date : 28.03.2019	Policy No.: 2.0
	Review & Revision Date : 27.07.2023	Policy No.: 3.0
	Review & Revised Policy Effective Date : 27.07.2023	

Base Document	:	Archival Policy
Initial Document Prepared by	:	
Functional aspects Checked by	:	Mr. P.K Ojha
Governing Guideline/Policy	:	Archival Policy

ARCHIVAL POLICY

Kiran Vyapar Limited

Archival Policy

In terms of Regulations 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Regulations'), a listed entity is required to host on the website maintained by the entity, all the material events/ information as disclosed to the Stock Exchange(s) for a minimum period of five years and thereafter in terms of the Archival Policy of such entity as disclosed on the website.

Kiran Vyapar Limited (the "Company") has formulated this Archival Policy (the 'Policy') for ensuring compliance with the provisions under Regulation 30(8) of the Regulations for protection, maintenance and archival of the Events or Information (defined below) disclosed to the Stock Exchange(s) which are also 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 (defined below) as may be decided by the Authorized Person (defined below).

Thereafter, in view of the recent amendments under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the policy has been revised with effect from April 1, 2019.

1. Definitions –

- a) **“Act”** means the Companies Act, 2013.
- b) **“Applicable Law”** means the Companies Act, 2013 and the rules made thereunder, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (including any modifications/ re-enactments thereof) and includes any other statute, law, rules, circulars, guidelines or standards under which disclosure of Events or Information on the website has been prescribed.
- c) **“Authorized Person”** means any person duly authorized by the Board, Managing Director or any Executive Director of the Company.
- d) **“Board”** means the Board of directors of the Company or its Committee.
- e) **“Company”** means Kiran Vyapar Limited.
- f) **“Events or Information”** refers to the information/ events that are required to disclose on the website of the Company in terms of Regulation 30(8) of the Regulations and other Applicable Law.
- g) **“Regulations”** means the Securities 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.

2. Coverage

This policy covers archival of all events or information which has been disclosed to Stock Exchange(s) and hosted on the website of the Company in accordance with the Regulations and other Applicable Laws.

3. Classification

The archival of Events or Information as disclosed or hosted on the website shall be done in the following manner:

- a) Where there is a period for which a document is required to be archived as per the Applicable Law, for the period as required by the Applicable Law.
- b) Where there is no such requirement as per the Applicable Law, then for a period of not less than three years.

4. Location of archival

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

5. Authority for approval of Policy

The Board shall have the authority for approval of this Policy in pursuance to the Regulations.

6. Authority to make alterations to the Policy

The Board 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 Act and Regulations.

7. Responsibility to review the website and Archived documents

In accordance with the provisions of Regulation 46 (3), the Authorized Person shall ensure to update any change in the content of the website within two working days of such change. The Authorized person of the Company shall be responsible for periodic and ongoing review of the contents of the website and keep the information up to date.

The contents with respect to Events or Information as disclosed under Regulation 30(8) of the Regulations would be moved to the archived folder after a period of 5 years from the date on which such disclosures/ announcements were made.

The contents with respect to Events or Information other than those mentioned above shall be moved to archived folder at such frequency as may be decided by the Authorized person subject to the provisions under the Applicable Law, if any.

8. Removal of archived Documents

The archived documents will be available in the archived folder for a period of three years. After the expiry of three years, the archived disclosures/ announcements shall be removed from the website of the Company.

9. Access to the documents archived

The contents of archived folder, on the website of the Company shall not be accessible to public.

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. Any change in the prescribed period of archiving in the Regulations or the other Applicable Laws shall mutatis mutandis apply to the corresponding related Clause of the Policy.

This Policy has been reviewed and approved by the Board of Directors of the Company at its meeting held on 27.07.2023.

Date: 27.07.2023

Place: Kolkata