

ARCHIVAL POLICY FOR DOCUMENTS

Oriental Trimex Limited

1. Preamble

Oriental Trimex Limited recognizes the importance of systematic retention, preservation and archival of documents and records to ensure compliance with applicable laws, operational efficiency and transparency.

This Archival Policy is framed in accordance with:

- **SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**, and
- **Companies Act, 2013** and other applicable laws.

2. Objective

The objectives of this Policy are to:

- Define the manner of retention and archival of documents
- Ensure availability of records for legal, regulatory and business purposes
- Comply with statutory record-keeping requirements
- Prevent unauthorized destruction or misuse of documents

3. Applicability

This Policy applies to:

- All departments of the Company
- All documents, records and information created or received by the Company
- Physical as well as electronic records

4. Definitions

4.1 Documents

“Documents” include records, files, papers, agreements, registers, disclosures, minutes, returns, reports, emails and data maintained in physical or electronic form.



4.2 Archival

“Archival” means storage of documents that are no longer in active use but are required to be retained for statutory, legal or historical purposes.

5. Classification of Documents

Documents shall be classified as:

a) Current Records

Documents required for day-to-day operations.

b) Archived Records

Documents that are no longer in current use but are retained for:

- Legal
 - Regulatory
 - Audit
 - Reference purposes
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6. Retention of Documents

- Documents shall be retained for such period as prescribed under applicable laws
 - In absence of a prescribed period, documents shall be retained for a minimum of **8 years** or as determined by Management
 - SEBI-mandated disclosures hosted on the website shall be retained as per Regulation 46 of SEBI (LODR)
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7. Archival of Documents

- Documents no longer required for current reference shall be archived in a secure manner
 - Archival may be done:
 - Physically (files, records rooms)
 - Electronically (servers, cloud, digital storage)
 - Archived documents shall be properly indexed for easy retrieval
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8. Preservation of Disclosures

- Disclosures made under **Regulation 30 of SEBI (LODR)** shall be:
 - Hosted on the Company's website for **minimum 5 years**
 - Thereafter archived as per this Policy
- Archived disclosures shall remain accessible upon request

9. Access & Control

- Access to archived documents shall be restricted to authorized personnel only
- Confidential and sensitive documents shall be protected against unauthorized access
- Responsibility for maintenance shall lie with the concerned department / Compliance Officer

10. Destruction of Documents

- Documents may be destroyed after completion of retention period
- Destruction shall be done in a secure manner ensuring confidentiality
- No document related to:
 - Ongoing litigation
 - Investigation
 - Auditshall be destroyed until clearance is obtained

11. Responsibility

- The **Compliance Officer / Company Secretary** shall be responsible for:
 - Implementation of this Policy
 - Monitoring compliance
 - Periodic review of archival practices

12. Confidentiality

All archived documents shall be maintained with strict confidentiality and shall not be disclosed except as required by law.

13. Policy Review & Amendment



- This Policy shall be reviewed periodically by the Board
- Amendments shall be made to align with changes in law or regulatory requirements
- Statutory provisions shall prevail in case of any inconsistency

For Oriental Trimex Limited

