



SMARTEN POWER SYSTEMS LIMITED

ARCHIVAL POLICY

[Pursuant to Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015]

(Adopted by Board of Directors in its meeting held on 12/12/2024. Effective from 12/12/2024)

SMARTEN POWER SYSTEMS LIMITED

CIN: U31401HR2014PLC052897

Registered Office:

374, 1st Floor Pace City-2, Sector-37,
Gurgaon, Haryana, India, 122001



ARCHIVAL POLICY

1. PREAMBLE:

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (“Listing Regulations”). The Listing Regulations come into force from May 15, 2024. The Listing Regulations mandate listed entities to formulate an archival policy.

The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this Listing Regulations, 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. OBJECTIVE:

The objective of this policy is to prescribe a policy for archival of disclosures of events or information which has been disclosed to the stock exchange(s) under Regulation 30 of the Listing Regulations and hosted on the website of the Company.

Through this Policy, the Company aims to provide a framework for ensuring dissemination and accessibility to relevant, sufficient, and reliable information on a timely and regular basis by all stakeholders

3. TITLE AND COMMENCEMENT:

This Policy is called “Archival Policy” or the “Policy” and shall come into force from 12/12/2024.

This Policy has been approved by the Board in its meeting held on 12/12/2024 and the same shall come into effect from 21/11/2024 or from such other date as per the Listing Regulations coming into effect and applicable.

4. DEFINITIONS:

“Act” shall mean the Companies Act, 2013 and the rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“Board of Directors” or “the Board” means the Board of Directors of the Company, as constituted from time to time.

“Listing Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.

“Material Events” means events as specified in Schedule III to the Listing Regulations from time to time upon occurrence of which the Company shall make disclosures to stock exchange as per the ‘Policy for Determination of Materiality of Event/Information’ of the Company.

“Stock Exchange” means the exchange where the shares of the Company are admitted for listing. Any other term not defined herein shall have the same meaning as defined in the Act, Listing Regulations or any other applicable law or regulation to the extent applicable to the Company.



5. ARCHIVING OF DOCUMENTS WHICH ARE HOSTED ON COMPANY'S WEBSITE:

- a. All documents generated, disclosed by the Company, on its website, for the purpose of shareholder communication, are the properties of the Company including archival material.
- b. Archival material of the Company shall not be destroyed or purged without the approval of the head of the department to which such archival material belongs. Provided that nothing contained herein shall be deemed to lead to an exception except in case of an accidental deletion, or deletion due to any system flaw, virus, or any other deletion, inaccessibility or loss due to any reason other than deliberate and determinate deletion.
- c. Archival material so selected for preservation shall be sent to the Company archives in consultation with the head of concerned department, which thereafter may be removed as per the schedule provided herein.

6. ARCHIVAL REQUIREMENT:

- 1) The disclosures made to Stock Exchange under Regulation 30 would be uploaded on the website of the Company.
- 2) The disclosure of material events shall be hosted on the Company's website for a minimum period of 5 (five) years from the date of posting.
- 3) Thereafter, the information would be archived under the heading "Past Events/ Information" and would be retained on the website for a period of 1 (One) year.

7. PROCEDURE:

The Company Secretary of the Company shall arrange for uploading on the website of the Company all the disclosures made by the Company in pursuance to the Regulation 30 of the Listing Regulations as soon as possible.

All such events or information so disclosed on the website of the Company in pursuance to Regulation 30 of the Listing Regulations shall be archived after the expiry of five (5) years from the date of such posting.

The events/ information so archived under "Historic Material Events/ Information" shall be preserved for a further period of three (3) years or till the time such events or information are resolved or closed, whichever is later.

In addition to maintaining the records on the website, the Company shall also maintain the physical copies of such disclosure made to the Stock Exchanges(s) which shall be preserved for the period as per the Company's Policy on Preservation of Documents.

8. AMENDMENT AND REVIEW OF THE POLICY:

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.



In the event of any conflict between the provisions of this Policy and of the Applicable Laws, the provisions of Applicable Laws shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Laws shall automatically apply to this Policy.

9. DISCLOSURES:

Archival Policy shall be disclosed on the website of the Company i.e. <https://www.smartenpowersystems.com/>