

EMA PARTNERS INDIA LIMITED

(formerly known as EMA Partners India Private Limited)

ARCHIVAL POLICY

Approved on: 21.08.2024
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*Archival Policy
Version 01*

ARCHIVAL POLICY

1. BACKGROUND

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) which came into force from December 1, 2015.

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 stockexchange(s) for a period of five years and thereafter in terms of the Archival Policy of such entity as disclosed on the website. It is in this context that the Archival Policy (“Policy”) is being framed and implemented by the Company.

2. OBJECTIVE

This Policy provides a framework for ensuring that information relating to the Company is adequately disclosed on its website as required by law and archived for a specified period as specified below, to facilitate retrieval, if required.

3. DEFINITIONS

Disclosures: For the purpose of this policy, disclosure shall mean all such events or information which has been disclosed to stock exchange(s) under Regulation 30 “Disclosure of events or information” of the Listing Regulations, and hosted on the website of the Company from time to time.

All the words and expressions used in this Policy, unless defined hereafter, shall have meaning respectively assigned to them under the Listing Regulations and in the absence of its definition or explanation therein, as per the Companies Act, 2013 (“Act”) and the Rules, Notifications and Circulars made/issued thereunder, as amended, from time to time.

4. ARCHIVAL OF DOCUMENTS

4.1. All events or information disclosed under Regulation 30 and any other Regulations (including the presentation and the audio/video recordings of post earnings/quarterly calls) to the Stock Exchanges on which the Company is listed and hosted on the Company’s website shall be available on the Company’s website for a period of five years or for such period as may be mandated under law from the date of uploading of the same on the website. However, if the disclosure requires a longer storage, the same will be considered appropriately as per the approval from Managing Director.

4.2. After the hosting period of five years or other such period is over, the Company shall archive these information and documents for a period of three years. Thereafter, the information/documents may be deleted permanently after obtaining approval from the Managing Director. Provided however, if the size of documents is very large or it becomes expensive to archive certain

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documents, then such documents may be removed/deleted from archives after taking prior approval of Managing Director.

4.3. The documents and records may be archived and shall be kept on the website of the Company.

4.4. The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

4.5. For disclosures made under other statutes/legislations

- All information required to be uploaded on the Company’s website in pursuance of any other statute / legislation / regulation, shall be hosted on the Company’s website for such period as may be mandated by that statute / legislation / regulation etc.
- In cases where the concerned statute / legislation / regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of three years from the date of uploading or till it is relevant.
- After the period as above has elapsed since the date of uploading of the information on the Company’s website, the same may be removed from the website, if required.

5. AUTHORITY FOR APPROVAL OF POLICY

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

6. AUTHORITY TO REVIEW AND MAKE ALTERATIONS TO THE POLICY

The Board shall review periodically this policy from time to time and also whenever necessitated due to any amendments to any Act, Rules or applicable Regulations and is authorized to make such alterations to any of the provision of this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations. The Board may also establish further rules and procedures, from time- to- time, to give effect to the intent of this Policy and further the objective of good corporate governance.

7. RESPONSIBILITY TO REVIEW THE WEBSITE AND ARCHIVED DOCUMENTS

In accordance with the provisions of Regulation 46 (3), the Authorised 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.
