

EFC (I) LIMITED

ARCHIVAL POLICY

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1. BACKGROUND REGULATION

Sub-Regulation 8 of Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) refers to an archival policy as per which, all events or information which has been disclosed to stock exchange(s) under Regulation 30 of the Listing Regulations shall be hosted on the website of EFC (I) Limited (the “Company”) for a minimum period of five years and thereafter as per the archival policy of the Company, which will be disclosed on its website i.e. www.efclimited.in.

2. PURPOSE

The purpose of this document is to formulate a policy for archival of the disclosures made on the website for information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations.

3. DEFINITIONS

“**Applicable laws**” means securities laws defined under Regulation 30(8) of the Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

“**Archive/archiving**” is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit, and preserving the historical memory and proof of an activity.

“**Board**” means board of directors of the Company as constituted from time to time.

“**Company**” means EFC (I) Limited.

“**Company Secretary and Compliance Officer**” means the company secretary and compliance officer appointed by the Board.

“**Document/s**” includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

“**Electronic Form**” means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise accessible to the Company.

“**Managing Director**” means the managing director appointed by the Board and/or the shareholders of the Company.

“**Effective Date**” means the date on which such Policy shall become effective i.e. May 29, 2024

“**Policy**” means this policy on archival of the disclosures made for on the website for information and events communicated to stock exchanges formulated by the Company.

4. ARCHIVAL PROCESS

- i. All the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations will be hosted on the website of the Company under the section entitled “Investor Relations” for a period of Five years and thereafter the

- same shall be archived so as to be available for retrieval for such period as may be decided by the Managing Director of the Company.
- ii. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company.
 - iii. This policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.
 - iv. All information will be retained for the mandated periods (“the mandated period”) mentioned in this Policy or as per applicable laws and/ or the SEBI LODR, as amended from time to time.
 - v. At the end of the mandated period, the information shall be destroyed; unless required to be retained for a longer period of time by litigation or tax hold. If documents are to be retained for a longer period than the mandated period, the Legal Team must be notified regarding the reason for the request, and shall make the determination as to whether the record(s) shall be retained.
 - vi. All information not necessary for legal or business reasons and not required to be retained by law or regulation shall be destroyed to reduce the high cost of storing, indexing and handling the records that would otherwise accumulate.
 - vii. Adequate records shall be developed and maintained to ensure compliance with all relevant laws and regulations.
Further, in case of special circumstances, the information not otherwise subject to retention for business reasons may need to be retained because of unusual circumstances such as litigation or a government investigation. If, for any reason, it is felt that such a situation exists, the Legal Team shall be immediately notified. When litigation or investigations do occur, the Legal Team shall notify the appropriate business/ functional teams and direct that the relevant categories of information shall be labelled for retention until further notice.

5. Archival of Information

The information that needs to be archived under regulation of 30(8) of the Listing Regulation comprises Financial Data, Press Releases, and Announcements on certain information and events, disclosed by the Company under the said regulation 30. The Investor’s page including the links thereunder, provide access to financial documents/ information which are regulatory in nature such as annual reports and financial results as also information/ data which is relevant to the media, researchers or investors who seek information on the growth of the Company and significant events of the past.

The information as statutorily required under the said regulations shall be hosted on the Company’s website for a minimum period of Five (5) years and thereafter maintained this information under the archival section for a further period of at least Five (5) years in the manner as deemed appropriate by the Company.

This Policy is lastly amended by the Board of Directors at its meeting held on May 29, 2024.
