



PUSHPA JEWELLERS LIMITED

ARCHIVAL POLICY

(Adopted by the Board of Directors on September 27, 2024)

CIN: U27310WB2009PLC135593

***Registered Address: 22, East Topsia Road, 4th Floor, Fl-4A, Tirumala, Gobinda Khatick Road,
Kolkata, A. C Lane, West Bengal, India, 700046***



Introduction:

In terms of Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “**SEBI Listing Regulations**”), every listed company is required to disclose on its website all such events or information which has been disclosed to stock exchanges where the securities of the Company are listed (the “**Stock Exchanges**”) under Regulation 30 of the SEBI Listing Regulations. Further, such disclosures shall be hosted on the website of the Company for a minimum period of 5 years and thereafter as per the archival policy of the Company, as disclosed on its website.

Accordingly, the Board of Directors (the “**Board**”) of Pushpa Jewellers Limited (the “**Company**”) have adopted the following policy:

Purpose & Scope:

The purpose of this Policy is to determine the period of record keeping and preservation of the physical as well as electronic records of the Company. Pursuant to the Regulation 30 of the SEBI Listing Regulations, the Company shall disclose on its website all such events or information which has been disclosed to Stock exchanges, and such disclosures shall be hosted and retained on the website of the Company for a minimum period of 5 (five) years and thereafter, as per this Policy. This Policy defines the time period for which material events likely to affect the working of the Company be disclosed on the Company’s website after the lapse of the aforementioned minimum period of five years.

The policy will be applicable to the Company.

Definitions:

“**Policy**” means this Archival Policy.

“**Material Events**” means events as specified in Schedule III to the Listing Regulations and upon the occurrence of which a listed entity shall make disclosures to stock exchange(s) and host such disclosures on the listed entity’s website.

Policy:

As mentioned above, disclosure of material events shall be hosted and retained on the Company’s website i.e. for a minimum period of 5 (five) years. Depending upon the nature, materiality, impact and relevance of the material event, the disclosure of such material event can continue to remain hosted on the Company’s website for a longer period of time as decided by the Board from time to time.

Disclosed information after more than five years, shall be kept in the archives of the Company for a period of 3 years. Anyone intending to review those disclosed information may write to Compliance Officer of the Company.

In case the aforesaid disclosures are required by any applicable law or regulation to be hosted for a period longer than that mentioned above, such disclosures shall be hosted on the website of the Company for such longer period.

Amendment:

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 case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations (“Statutory Provisions”), the provisions of Statutory Provisions shall prevail.

Officer responsible:

The Company Secretary and any other person authorized by the board of the Company shall be responsible for ensuring overall compliance of this Policy.

Disclosure:

This Policy will be disclosed on the Company’s website at www.pushpajeweller.com
