

SANGHI INDUSTRIES LIMITED
WEBSITE CONTENT ARCHIVAL POLICY

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1. PREAMBLE

Securities and Exchange Board of India has notified Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. These Listing Regulations require every listed Company to disclose on its website certain information which has been disclosed to the Stock Exchange(s) and keep it hosted for such minimum period, as may be prescribed by Securities and Exchange Board of India ("SEBI") and thereafter as per the archival policy of the listed entity, as disclosed on its website.

2. SCOPE

This policy shall govern the disclosure and archival of such information only which have been disclosed on the Website pursuant to the compliance with the above-mentioned Listing Regulations and which are disclosed with stock exchanges. Other contents displayed / hosted on the website shall be out of purview of the Policy and can be archived / deleted as per the requirement of the content.

3. OBJECTIVES OF THE POLICY

The main objective of this policy is to ensure that the Information disclosed to the stock exchanges pursuant to the Listing Regulations are promptly hosted on the website and transferred to the Archives folder of the Website only after the completion of their respective minimum web-hosting period prescribed by SEBI from the date of disclosure or event.

The major objectives of the policy are:

- Identification of Information, which is required to be disclosed on the website of the Company.
- Ensuring that the information is disclosed at the relevant link and there is unanimity in the same every time.
- Ensure that all the information, documents, events disclosed on the website of the Company, unless otherwise specified in the Listing Regulations, shall remain on the website for such minimum period, as prescribed by SEBI, from the date of disclosure.

The Information shall be moved to the respective archives folder on the Website after the completion of their minimum web-hosting period from the date of disclosure.

- Information which is required to be hosted on the website for a particular period, shall be deleted after the due date, therefore, it shall not be saved to archives folder.
- Certain documents like Policies, Codes of Conduct, Memorandum of Association and Articles of Association and such other documents which are required to be continuously displayed on the website, shall not be archived.

4. DEFINITIONS

"Act" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;

"Board of Directors" or "Board", means the collective body of the Directors of the company;

"Company", "This Company", "The Company", "Company" wherever occur in the policy shall mean "Sanghi Industries Limited";

"Information", means such information, documents, disclosures, events etc., which are required to be disclosed on the Website, in compliance with applicable provisions of the Act and/or Listing Regulations;

"Listing Regulations" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

"Policy" or "This Policy" means, "Website Content Archival Policy";

"Website" means website of the Company i.e . <https://www.sanghiment.com/>

5. INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Act, Listing Regulations and/or any other applicable SEBI Regulation(s) as amended from time to time.

6. POLICY

The information which is required to be disclosed on the website, in compliance of the Act and Listing Regulations shall be uploaded on the website within the prescribed timelines. The website shall be reviewed on regular intervals for ensuring that all the relevant information is available on the website as required.

The Information, unless otherwise mentioned in the Act or Listing Regulation itself, shall remain hosted on the website for the specified period and thereafter shall be moved/transferred to Archives folders under the respective heads / sub-folders, in a way so that it can be searched easily as and when required by any person. The Information shall be kept in the archive folders till such time as may be required by law.

Detailed list of information to be uploaded and updated on Website and the period after which is may be archived is enclosed as **Annexure** forming part of this policy.

7. POLICY OREVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

8. DISCLOSURES

The updated policy shall be continuously hosted on the website.

ANNEXURE

A) THE FOLLOWING INFORMATION SHALL BE UPLOADED ON THE WEBSITE AND SHALL BE UPDATED WITHIN TWO WORKING DAYS FROM THE DATE OF OCCURANCE OF CHANGE

1. Details of Company business.
2. Company's Memorandum of Association and Articles of Association;
3. Brief profile of Company's Board of Directors, including their directorship and full-time positions in other body corporates;
4. Terms and conditions of appointment of Independent Directors.
5. Composition of various committees of Board of Directors.
6. Code of conduct of Board of Directors and Senior Management Personnel.
7. Details of establishment of Vigil Mechanism/ Whistle Blower policy.
8. Criteria of making payments to non-executive directors, if the same has not been disclosed in annual report.
9. Policy on dealing with related party transactions.
10. Policy for determining 'material' subsidiaries.
11. Details of familiarization programs imparted to Independent Directors.
12. Email address for grievance redressal and other relevant details.
13. Contact information of the designated officials who are responsible for assisting and handling investor grievances.
14. Financial information including:
 - i. notice of meeting of the Board of Directors where financial results shall be discussed;
 - ii. financial results, on conclusion of the meeting of the Board of Directors where the financial results were approved.
 - iii. complete copy of the annual report including balance sheet, profit and loss account, director's report, corporate governance report etc.
15. Shareholding Pattern.

16. Details of agreements entered into with the media companies and/or their associates, etc.
17. Schedule of analyst or institutional investor meet at least two working days in advance (excluding the date of the intimation and the date of the meet
18. Presentations prepared by the Company for analysts or institutional investors meet, post earnings or quarterly calls, prior to beginning of such events.
19. Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means, in the following manner:
 - i) The audio recordings, promptly and in any case, before the next trading day or within 24 hours from the conclusion of such calls, whichever is earlier;
 - ii) the video recordings, if any, within 48 hours from the conclusion of such calls;
 - iii) the transcripts of such calls along with simultaneous submission to recognized stock exchanges within five working days of the conclusion of such calls.
20. New name and the old name of the Company, for a continuous period of one year, from the date of the last name change, if applicable.
21. Items in sub-regulation (1) of regulation 47.
22. All credit ratings obtained by the entity for all its outstanding instruments, updated immediately as and when there is any revision in any of the ratings.
23. Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year, uploaded at least 21 days prior to the date of the annual general meeting which has been called to inter alia consider accounts of that financial year.
24. Secretarial compliance report as per Regulation 24A(2) of Listing Regulations;
25. Disclosure of the policy for determination of materiality of events or information required under Regulation 30(4)(ii) Listing Regulations;
26. Disclosure of contact details of key managerial personnel who are authorized for the purpose of determining materiality of an event or information and for

the purpose of making disclosures to stock exchange(s) as required under Regulation 30(5) of Listing Regulations;

27. Disclosures under Regulation 30(8) of Listing Regulations;

28. Statements of deviation(s) or variation(s) as specified in Regulation 32 of Listing Regulations;

29. Dividend distribution policy by listed entities based on market capitalization as specified in Regulation 43A(1);

30. Annual return as provided under Section 92 of the Act and the rules made thereunder.

31. Employee Benefit Scheme Documents, excluding commercial secrets and such other information that would affect competitive position of the listed entity, framed in terms of the provisions of Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021:

Provided that redaction of information under this clause 31 from the Employee Benefit Scheme document shall be approved by the Board and shall be in compliance with guidelines as may be specified by SEBI."

B) THE FOLLOWING INFORMATION SHALL BE ARCHIVED AFTER A PERIOD OF TWO YEARS:

The audio recordings and video recordings, if any, of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means

C) THE FOLLOWING INFORMATION SHALL BE ARCHIVED AFTER A PERIOD OF FIVE YEARS:

1. Disclosures made under Regulation 30 of the Listing Regulations.
2. Information pursuant to Regulation 62 of the Listing Regulations.
3. Any other disclosures of event/information as specified by SEBI from time to time.
