

ARCHIVAL POLICY

Adopted by the Board on 17th September 2025

VISHAL NIRMITI LIMITED

1. Introduction:

Vishal Nirmiti Limited ('Company') is a public limited company. The Company is into the business of civil engineering, manufacturing and construction company, primary engaged in the business of manufacturing and dealing of Pre-Stressed Concrete (PSC) sleepers for railways, pre cast and prestressed concrete products for various applications and also into fabrication and erection of Mild Steel Pipes (MS Pipes), MS Line, and Penstock pipes for Pumped Storage Project (PSP). We provide engineering, procurement, infrastructure and construction services for railway infrastructure and various civil engineering, irrigation and infrastructure development projects across sectors such as railways, renewable power and industrial sectors. Our business is divided into two segments, namely, (a) Manufacturing segment and (b) Services segment.

In terms of Regulation 9 and 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "**SEBI Listing Regulations**"), requires every listed company 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 Vishal Nirmiti Limited (the "**Company**") has adopted the following policy:

2. Purpose & Scope:

The purpose of this Policy is to frame the guidelines for fundamental accountability of the Company to retain and preserve its documents as the basis for communication with a range of stakeholders and to determine the period of record keeping and preservation and disposal 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.

This policy is framed for the following purposes: (a) Systematic identification, categorization, maintenance, review, retention and destruction of documents received or created during the course of business. (b) Providing guidelines for identification of documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed off, if no longer needed and how the documents should be accessed and retrieved when they are needed.

The policy covers all relevant documents and records generated during the course of operations of the Company.

The policy will be applicable to the Company.

3. 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.

"**Preservation of Documents**" classified under Regulation 9 of the LODR Regulations is as follows:

- Documents whose preservation shall be permanent in nature.
- Documents with preservation period of not less than eight years after completion of the relevant transactions.

"**Unit**" means Business Establishment located at various locations at present and at such locations, as may be established, from time to time.

“Preservation” or “preserve” means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent them from being damaged or destroyed or tampered with.

4. Policy:

The Board of Directors have classified the following documents to be retained and preserved for posterity. (a) Documents that need to be preserved / retained permanently. (b) Documents that will be preserved / retained for a period of 8 years as specified under the Companies Act 2013 or LODR Regulations. (c) Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case. (d) Documents like internal budgets etc., which may be retained for less than 8 years. While maintaining the records in physical form when required under various statutes for specified periods, the company records may be maintained in digital form for non-statutory purposes

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.

5. 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 there under and Listing Regulations (“Statutory Provisions”), the provisions of Statutory Provisions shall prevail.

6. Preservation Principles

It is only through preservation that continued availability access to documents can be maintained. The following principles shall be adhered:

- Documents shall be preserved in their original format, wherever possible, respecting the physical integrity and authenticity of the original documents. Wherever practicable, a digital version is preferable for physical document.
- Active conservation mechanism at regular intervals be employed as and when appropriate to prevent further deterioration / damage to document(s)
- Appropriate conservative measures shall be taken into account, considering the need, significance, value and usage of the document in question.

The employees of the Company shall be made aware at regular intervals of the importance of preservation of documents and shall be trained in safe handling of documents.

7. Storage and Archival of Records:

A record that is no longer required in which it originated or was received, and that has permanent legal, institutional or historical value is to be archived.

Concrete Sleepers ● Infrastructure

Hard copies or scanned copies of documentation beyond its operational date may be kept onsite for reference purposes and the Information Technology department of the Company shall have a back-up of the electronic data at an appropriate safe location.

Copies of all material disclosures made to the stock exchanges under Regulation 30 of the LODR Regulations shall be hosted on the website of the Company for a minimum period of 5 years. After a period of 5 years from the date of filing the records or documents with the stock exchanges, the copies of such records or documents shall be archived from the website of the Company

8. Document destruction process and Disposal of Documents

It must be ensured that all copies of information, which are no longer required to be retained are permanently and completely destroyed. The information must be removed from all electronic media devices.

Some records are scheduled for destruction immediately after active use; others are scheduled for destruction after the semi-active phase of retention.

Physical destruction for paper-based records are defined as confidential shredding. Physical destruction for electronic documents and e-mail or physical destruction of stored media is defined as deleting the documents from active computer system repositories. Drafts of documents need not be retained, unless the concerned Departmental / Unit Head advise otherwise.

The documents after the said period of 8 years (whose preservation shall not be permanent in nature) may be disposed off, in the presence of the concerned Departmental / Unit Heads. The disposal of significant documents should be documented by the relevant Departmental / Unit Heads by keeping a record of the document disposed off, the date and the method of disposal and who authorized the disposal.

9. Officer responsible:

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

10. Disclosure:

This Policy will be disclosed on the Company's website www.vishalnirmiti.com