

VISHVPRABHA TRADING LIMITED

(CIN - L51900MH1985PLC034965)

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DOCUMENT RETENTION AND ARCHIVAL POLICY

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As adopted by the Board of Directors at the Board Meeting held on September 1, 2018

This policy deals with the retention and archival of the corporate records of **VISHVPRABHA TRADING LIMITED** (hereinafter, referred to as 'the Company').

Corporate records are all paper or electronic records that are produced by the Company's employees, including but not limited to, memoranda, contracts, e-mails, time sheets, effort estimates and expense records.

The Company is required to maintain certain types of corporate records for a specified period of time. Failure to do so could subject the Company and its employees to serious legal consequences. All employees are expected to fully comply with this policy.

Generally, all corporate records (whether electronic or paper) of the Company are to be retained for no less than three (3) years, and may be destroyed thereafter. If an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal requirement or otherwise.

Additionally, there are certain types of records that need to be retained for a longer period of time, as identified below;

(i) Board of Directors Records

Minutes of meetings of the Board of Directors shall be maintained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for no less than three (3) years.

(ii) Public Filings

All publicly filed documents shall be maintained in perpetuity. All documents filed with the stock exchange/shall be maintained for no less than five (5) years on the website of the company.

(iii) Books of Accounts and Tax Records

Books of accounts and Tax records should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used.

(iv) Employment Records

The Company maintains personnel records that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment, such as actions taken against personnel.

These records should be retained for a period of three (3) years following the cessation of employment.

(i) Intellectual Property Records

Documents relating to the development and protection of intellectual property rights should be maintained for the life of such intellectual property right.

(ii) Contracts

Execution copies of all contracts entered into by the Company should be retained for at least three (3) years following the expiry or termination of the contracts.

The Company has made appropriate provision for the backup of its digital data. The backup copies are actively maintained to ensure their continued viability.

In case of any force majeure event, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

All the data and records i.e. paper or electronic including but not limited to memoranda, contracts, e-mails, time sheets effort estimates, etc. may be destroyed/ defecated/ deleted after the abovementioned period as per the instructions of the Managing Director of the Company from time to time.

The amendments, if and when necessary, in the policy shall be affected subject to approval of the Board.

Failure to comply with this policy may result in disciplinary action against the employee, including suspension or termination.