



VITAL CHEMTECH LIMITED

ARCHIVAL POLICY

(Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

ARCHIVAL POLICY

1. INTRODUCTION

Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) requires every listed company to formulate an Archival policy for treatment of events /information disclosed to stock exchanges and hosted on the website of the company.

Accordingly, the Board of Directors of Vital Chemtech Limited (“**Company**”) has formulated and adopted this Archival Policy pursuant to the Listing Regulations in order to have a framework in place to ensure proper hosting of events and information disclosed to the Stock Exchanges pursuant to Regulation 30 of the Listing Regulations (collectively “**Disclosed Information**”)

2. PURPOSE & SCOPE

The purpose of this document is to formulate a policy for archival of the information’s and events communicated to the stock exchanges and hosted on the website under Regulation 30 of the 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.

3. DEFINITIONS

“**The Company**” or “**Company**” means “Vital Chemtech Limited”.

“**Board of Directors**” or “**the Board**” means the Board of Directors of the Company, as constituted from time to time.

“**SEBI Listing Regulations**” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Policy**” means this Archival Policy adopted/amended by the Board on November 14, 2025 and as amended from time to time.

“**Preservation of Documents**” refers to as classified under Regulation 9 of the Listing Regulations is as follows:
a) Documents whose preservation shall be permanent in nature and b) Documents with preservation period of not less than eight years after completion of the relevant transactions.

“**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.

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

4. ARCHIVAL PROCESS

- (i) All Events and information identified as Material Events as per regulations on Disclosure of material events/ information and communicated to the stock exchanges shall be hosted on the website of the Company for a minimum period of five (5) years and thereafter shall be archived. 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.
- (ii) 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.
 - (iii) Documents that will be preserved / retained for a period of 8 years as specified under the Companies Act 2013 or SEBI Listing Regulations
 - (iv) Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case.
 - (v) 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 archived information may write to compliance officer of the Company.
 - (vi) In case the aforesaid disclosures are required by any applicable law or regulation or competent authority 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, as approved by the Board from time to time.

Material events for their continued disclosure on the Company's website:

Sl. No.	Material Event
Events which shall be disclosed without any application of the guidelines for materiality (Materiality Policy) as specified in sub-regulation Regulation 30(4) of SEBI (LODR) Regulations 2015.	
1	Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation, merger/ demerger or restructuring), sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the Company, sale of stake in associate company of the Company or any other restructuring.
2	Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.
3	New Rating(s) or Revision in Rating(s).
4	Outcome of Meetings of the Board of Directors: The Company shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting, held to consider the following: <ol style="list-style-type: none"> a. dividends and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched; b. any cancellation of dividend with reasons thereof; c. the decision on buyback of securities; d. the decision with respect to fund raising proposed to be undertaken; e. increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched; f. reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to; g. short particulars of any other alterations of capital, including calls; h. financial results; i. decision on voluntary delisting by the Company from stock exchange(s): Provided that in case of board meetings being held for more than a day, the financial results shall be disclosed within thirty minutes of the end of the meeting for the day and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.
5	Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the Company), agreement(s)/ treaty(ies)/ contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.

5A	<p>Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the Company or of its holding, subsidiaries or associate company, among themselves or with the Company or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the Company or impose any restriction or create any liability upon the Company, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the Company is a party to such agreements.</p> <p>Provided that such agreements entered into by the Company in the normal course of business shall not be required to be disclosed unless they, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the Company or they are required to be disclosed in terms of any other provisions of these regulations.</p>
6	Fraud/defaults by our Company, its promoters, director, key managerial personnel, senior management, promoter or director of our Company, whether occurred within India or abroad:
7	Change in directors, Key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), senior management, Auditors and Compliance Officer.
7A	In case of resignation of the auditor of our Company, detailed reasons for resignation of auditor, as given by the said auditor, shall be disclosed by the Company to the stock exchanges as soon as possible but not later than twenty-four hours of receipt of such reasons from the auditor.
7B	<p>Resignation of independent director including reasons for resignation: In case of resignation of an independent director of the Company, within seven days from the date of resignation, the following disclosures shall be made to the stock exchanges by the listed entities:</p> <ol style="list-style-type: none"> i. The letter of resignation along with detailed reasons for the resignation as given by the said director <ol style="list-style-type: none"> a. Names of the listed entities in which the resigning director holds directorships, indicating the category of directorship and membership of board committees, if any. ii. The independent director shall, along with the detailed reasons, also provide a confirmation that there are no other material reasons other than those provided. iii. The confirmation as provided by the independent director above shall also be disclosed by the Company to the stock exchange along with the disclosures as specified in clause (i) and (ii) above
7C	In case of resignation of key managerial personnel, senior management, Compliance Officer or director other than an independent director; the letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director shall be disclosed to the stock exchanges by the Company within seven days from the date that such resignation comes into effect.
7D	In case the Managing Director or Chief Executive Officer of the Company was indisposed or unavailable to fulfil the requirements of the role in a regular manner for more than forty five days in any rolling period of ninety days, the same along with the reasons for such indisposition or unavailability, shall be disclosed to the stock exchange(s).
8	Appointment or discontinuation of share transfer agent.
9	<p>Resolution plan/ Restructuring in relation to loans/borrowings from banks/financial institutions including the following details:</p> <ol style="list-style-type: none"> i. Decision to initiate resolution of loans/borrowings; ii. Signing of Inter-Creditors Agreement (ICA) by lenders; iii. Finalization of Resolution Plan; iv. Implementation of Resolution Plan; v. Salient features, not involving commercial secrets, of the resolution/ restructuring plan as decided by lenders.
10	One time settlement with a bank.
11	Winding-up petition filed by any party / creditors.
12	Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the Company.
13	Proceedings of Annual and extraordinary general meetings of the Company
14	Amendments to memorandum and articles of association of the Company, in brief.

15	<ul style="list-style-type: none"> a) Schedule of analysts or institutional investors meet at least two working days in advance (excluding the date of the intimation and the date of the meet) and presentation made by the Company to analysts or institutional investors. b) Audio or video recordings and transcripts of post earnings/quarterly calls, by whatever name called, conducted physically or through digital means, simultaneously with submission to the recognized stock exchange(s), in the following manner: <ul style="list-style-type: none"> (i) the presentation and the audio/video recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier; (ii) the transcripts of such calls shall be made available on the website within five working days of the conclusion of such calls.
16	<p>The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code:</p> <ul style="list-style-type: none"> a) Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default; b) Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default; c) Admission of application by the Tribunal, along with amount of default or rejection or withdrawal, as applicable ; d) Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code; e) List of creditors as required to be displayed by the corporate debtor under regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016; f) Appointment/ Replacement of the Resolution Professional; g) Prior or post-facto intimation of the meetings of Committee of Creditors; h) Brief particulars of invitation of resolution plans under section 25(2)(h) of Insolvency Code in the Form specified under regulation ; i) Number of resolution plans received by the Resolution Professional; j) Filing of resolution plan with the Tribunal; k) Approval of resolution plan with the Tribunal; l) Specific features and details of the resolution plan as approved by the Adjudicating Authority under the Insolvency Code, not involving commercial secrets, including details such as: <ul style="list-style-type: none"> i. Pre and Post net-worth of the company; ii. Details of assets of the company post CIRP; iii. Details of securities continuing to be imposed on the companies' assets; iv. Other material liabilities imposed on the company; v. Detailed pre and post shareholding pattern assuming 100% conversion of convertible securities; vi. Details of funds infused in the company, creditors paid-off; vii. Additional liability on the incoming investors due to the transaction, source of such funding etc; viii. Impact of the investor-revised P/E, RONW ratios etc; ix. Names of the new promoters, key managerial personnel, if any and their past experience are in the business or employment. In case where promoters are companies, history of such company and names of natural persons in control; x. Brief description of business strategy. m) Any other material information not involving commercial secrets. n) Proposed steps to be taken by the incoming investor/acquirer for achieving the MPS; o) Quarterly disclosure of the status of achieving the MPS; p) The details as to the delisting plans, if any approved in the resolution plan.

17	<p>Initiation of Forensic audit: In case of initiation of forensic audit, (by whatever name called), the following disclosures shall be made to the stock exchanges by Company:</p> <p>a) The fact of initiation of forensic audit along-with name of entity initiating the audit and reasons for the same, if available;</p> <p>b) Final forensic audit report (other than for forensic audit initiated by regulatory / enforcement agencies) on receipt by the Company along with comments of the management, if any.</p>
18	<p>Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of the Company, in relation to any event or information which is material for the Company in terms of regulation 30 of the Listing Regulations and is not already made available in the public domain by the Company.</p>
19	<p>Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the Company or its directors, key managerial personnel, senior management, promoters or subsidiaries, in relation to the Company, in respect of the following:</p> <p>(a) search or seizure; or</p> <p>(b) re-opening of accounts under Section 130 of the Companies Act 2013; or</p> <p>(c) investigation under the provisions of Chapter XIV of the Companies Act, 2013; along with the following details pertaining to the action(s) initiated, taken or orders passed:</p> <ol style="list-style-type: none"> i. Name of the authority; ii. Nature and details of the action(s) taken, initiated or order(s) passed; iii. Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority; iv. Details of the violation(s)/ contravention(s) committed or alleged to be committed; v. Impact on financial, operation or other activities of the Company, quantifiable in monetary terms to the extent possible.
20	<p>Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the Company or its directors, key managerial personnel, senior management, promoters or subsidiary, in relation to the Company, in respect of the following:</p> <p>(a) suspension;</p> <p>(b) imposition of fine or penalty;</p> <p>(c) settlement of proceedings;</p> <p>(d) debarment;</p> <p>(e) disqualification;</p> <p>(f) closure of operations;</p> <p>(g) sanctions imposed;</p> <p>(h) warning or caution; or</p> <p>(i) any other similar action(s) by whatever name called along with the following details pertaining to the actions(s) initiated, taken or orders passed:</p> <ol style="list-style-type: none"> i. Name of the authority; ii. Nature and details of the action(s) taken, initiated or order(s) passed; iii. Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority; iv. Details of the violation(s)/contravention(s) committed or alleged to be committed; v. Impact on financial, operation or other activities of the Company, quantifiable in monetary terms to the extent possible.
21	<p>Voluntary revision of financial statements or the report of the board of directors of the Company under section 131 of the Companies Act, 2013.</p>
<p>Events which shall be disclosed upon application of the guidelines for materiality (Materiality Policy) referred Regulation 30(4) of SEBI (LODR) Regulations 2015.</p>	
1	<p>Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.</p>
2	<p>Any of the following events pertaining to the Company:</p> <ol style="list-style-type: none"> a) arrangements for strategic, technical, manufacturing, or marketing tie-up, b) adoption of new line(s) of business; or c) closure of operations of any unit, division or subsidiary (in entirety or in piecemeal).

3	Capacity addition or product launch.
4	Awarding, bagging/ receiving, amendment or termination of awarded/bagged Orders /contracts not in the normal course of business.
5	Agreements (viz. loan agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof
6	Disruption of operations of any one or more units or division of the Company due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
7	Effect(s) arising out of change in the regulatory framework applicable to the Company.
8	Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the Company.
9	Fraud or defaults by employees of the Company which has or may have an impact on the Company.
10	Options to purchase securities including any ESOP/ESPS Scheme.
11	Giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party. for any third party.
12	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
13	Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority.

Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.

Without prejudice to above, the Company may make disclosures of event/ information as specified by the Board from time to time. The Board at its discretion may increase or decrease the time period for continued disclosure of any of the material events.

5. REVIEW OF THE WEBSITE CONTENT

The website of the Company shall be periodically reviewed in order to ensure updation as per the SEBI Listing Regulations amended from time to time. Further, 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. The Company shall active conservation mechanism at regular intervals as and when appropriate to prevent further deterioration / damage to document(s). The Company shall take 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.

6. 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.

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 SEBI Listing 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.

7. AMENDMENT

Any change in the Policy shall be approved by the Board of the Company. The Board 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 if 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**”) then the Statutory Provisions shall prevail over the Policy to that extent and the Policy shall be deemed to have been amended so as to be read in consonance with the Statutory Provisions.

As this Policy is pursuant to the applicable laws, if any change to applicable laws or interpretation thereof necessitates any change to the Policy, this Policy shall be read so as to accommodate the changes.

8. OFFICER RESPONSIBLE

The Company Secretary and Compliance Officer of the Company shall be responsible for ensuring overall compliance of the policy.

9. EFFECTIVE DATE

Provisions of the regulations under this policy are applicable to the company from the date the securities of the company are listed on Stock Exchanges.
