



DOCUMENTS RETENTION AND ARCHIVAL POLICY

(Latest amended on: March 25, 2025)

STUDDS ACCESSORIES LIMITED

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DOCUMENTS RETENTION AND ARCHIVAL POLICY

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STUDDS ACCESSORIES LIMITED

DOCUMENTS RETENTION AND ARCHIVAL POLICY (“THE POLICY”)

1 PREFACE:

The Board of Directors has approved the Documents retention and Archival Policy (“**The Policy**”) on March 25, 2025. In pursuance of Regulation 30(8) and Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), **STUDDS ACCESSORIES LIMITED** (the “**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 (“**Stock Exchanges**”). 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 Company has adopted this **“DOCUMENTS RETENTION AND ARCHIVAL POLICY (“THE POLICY”)**.

Additionally, Regulation 46(2)(oa) of the Listing Regulations requires listed entities to host on their website, audio-video recordings, presentations and transcripts pertaining to post earnings/ quarterly calls (by whatever name called) conducted physically or through digital means for a minimum period of 5 (five) years and 2 (two) years respectively and thereafter to archive the same as per the archival policy of the company.

The Policy will be effective from the date of listing of the Equity Shares the Company on Stock Exchanges.

2 POLICY OBJECTIVE:

To define principles and guidelines for ensuring preservation, protection, maintenance and archival of **STUDDS ACCESSORIES LIMITED** (“the Company”) disclosures, documents and records that are placed on its website www.studds.com which includes: -

- a) To capture and store all relevant Records and Documents.
- b) To ensure security and verified access to all relevant Records and Documents.
- c) To preserve the Documents or Records for legal, administrative and historical purposes.
- d) To ensure back-up and allow for continuity in the event of a disaster.
- e) To comply with all regulatory and other legal requirements.

Thus, this Policy aims at ensuring creation and management of authentic, reliable and usable archives for accountability purposes and for preservation of the Company's collective memory.

3 DISCLOSED EVENT/INFORMATION:

The events or information which has been disclosed by the Company to the Stock Exchange in accordance with the Listing Regulations and the Company's Policy on Determination of Materiality of Events/Information shall be available on the Company's website for a minimum period of five years from the date of its hosting on the website. Upon expiry of a period of five years from the date of such disclosures being hosted on the website of the Company, the disclosed event or information will be archived as per this Policy.

4 ARCHIVAL AND PRESERVATION OF DISCLOSED EVENTS/INFORMATION:

The disclosed events/information on the website of the Company will be reviewed on an ongoing basis. All disclosed events/information on the website of the Company would be moved to an archival folder after a period of 5 years from the date on which such events/information are put up on the website. Thereafter, such disclosures shall be kept in the Archives of the Company for a period of 2 years ***{or any other period as may be decided}***. Further, 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. The website of the Company shall be periodically reviewed in order to ensure updation of information and documents on the website.

After the expiry of 2 years, the archived disclosures/announcements will be removed from the website of the Company and will be saved with the Corporate Secretarial team, in case the documents need to be referred. The Shareholders in case they need any information, which is not available on the website, they may write a mail with your query to the Corporate Secretarial Officer at secretarial@studds.com.

The Company is free to use the services of an external vendor with appropriate experience and infrastructure in this regard.

5 DISPOSAL AND DESTRUCTION OF DOCUMENTS:

- 5.1 Documents should be preserved and the same may be done either in physical or in electronic mode or both.
- 5.2 For Category A – Permanent Preservation of Documents, necessary back-up, wherever possible, be maintained.
- 5.3 For Category B – Periodic Preservation of Documents, back-up and mode of preservation should be decided depending upon the importance, frequency of use and cost efficiency.
- 5.4 Following documents may be destructed. Before destruction, a particular user group/ Directorate may consider retaining electronic / scan version however, the same is not mandatory.
 - (a) Documents which are neither falling in ‘Category A – Permanent Preservation of Documents’ nor falling in ‘Category B – Periodic Preservation of Documents’ and such Document(s) would not provide any future utility may be destructed, with the consent / permission of immediate reporting authority.
 - (b) Documents which were falling in ‘Category B – Periodic Preservation of Documents’ and the period or the needs of Company have been completed and such Document(s) would not provide any future utility may be destructed, with the consent / permission of immediate reporting authority.
 - (c) Extra copies of Document(s) may be destructed.

6 AMENDMENT:

The Policy can be amended, modified or revised by the Board of the Company from time to time. 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.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, such amendment(s), clarification(s), circular(s) etc. shall prevail upon the relevant provisions of the Policy and this Policy shall stand amended accordingly from the effective date of such amendment(s), clarification(s), circular(s) etc.

The Board of Directors of Studds are authorised to make any change in the Policy.
