ALFRED HERBERT (INDIA) LIMITED ARCHIVAL POLICY

1. Background

The Securities and Exchange Board of India has notified SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. ("Listing Regulations" on September 2, 2015 to be effective from December 1, 2015.

Regulation 30 of these Listing Regulations deals with disclosure of material events by the listed entity specified under Part A of Schedule III of the Listing Regulations.

Further, SEBI has issued a circular on 'Continuous Disclosure Requirements for Listed Entities' on September 3, 2015 indicating the details that need to be provided while disclosing above events.

Regulation 30 and the above circular states that :

- a) The events specified in Para A of Part A of Schedule III of the Listing Regulations are deemed to be "Material Events" and the listed entity shall make disclosures of such events to the Stock Exchanges.
- b) The events specified in Para B and Part A Schedule III of the Listing Regulations are to be disclosed to the stock exchanges, if considered "Material" pursuant to the Company's Policy on "Reporting of Material Events under Regulation 30 of Listing Regulations".
- c) Any other information specified in Part C of Schedule III of the Listing Regulations are to be disclosed to the Stock Exchanges
- d) The events or information with respect to subsidiary companies, which are considered "Material" for the Company.

As per Regulation 30(8) of the Listing Regulation, the Company is required to disclose on its website all such events or information which is to be disclosed to the Stock Exchanges pursuant to this Regulation.

The disclosures made to the Stock Exchanges shall be hosted on the website of the Company for a minimum period of 5 (five) years and thereafter, as per the Archival Policy of the Company. This Policy is to be uploaded in the website of the Company.

2. Archival Requirement:

The disclosures made to stock exchanges would be provided to the Information Technology (IT) department by the Company Secretarial Department for uploading in the website of the Company.

The information provided to IT would be promptly uploaded in the website of the Company and would be hosted in the website for five years period from the date of such hosting.

Thereafter, the information would be archived under the heading "Past Events/ Information" and would be retained in the website for a period of five years.

3. Review of the Policy:

In case there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Director. However, the amended regulatory requirements will supersede the Policy till the time Policy is suitably amended.