

1. INTRODUCTION

EASUN CAPITAL MARKETS LTD (hereafter referred to as "Company" in this document) believes in promoting a fair, transparent, ethical and professional work environment. This Policy aims to preserve Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as "the Documents").

This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

2. PURPOSE OF THE POLICY

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

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

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode

Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

3. POLICY

3.1 Preservation of Documents

a. **Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

- i. the documents whose preservation shall be permanent in nature

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently.

- ii. documents with preservation period of not less than eight years after completion of the relevant transactions

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, and Notifications etc. for a period of not less than eight years after completion of the relevant transactions shall be preserved accordingly.

- iii. documents with preservation period other than those mentioned in 2) above

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in 1) & 2) above shall be preserved accordingly.

b. **Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations**

The Company is to maintain a functional website containing

- i. the basic information about the Company,
ii. all Information and/or documents as specified in the applicable provisions of Companies Act, 2013,

- iii. all Information and/or documents as specified in Regulation 46 (2) of the Listing Regulations,
 - iv. all Information and/or documents mentioned in Part (B) of Annexure 2 of this policy, which are required to be made available on the website of the Company.
 - v. all Information and/or documents as mentioned in Regulation 30 of the Listing Regulations on Material Events.
 - vi. all Information and/or documents provided to/ filed with stock exchanges.
- c. The Company shall ensure that contents of the website are correct.
- d. Information and/or Documents, required to be made available on the website under Regulation 46(2) of the Listing Regulations, shall be made available on the website within two working days from the date of dissemination of information and/or documents by the Company, unless specified otherwise (refer Clause 46(3) of Listing Regulations). The Company shall update any change in the content of its website within two working days from the date of such change in content.
- e. Information and/ or Documents that need to be made available under Regulation 30 of the Listing Regulations shall be made available on the website simultaneously with disclosure to Stock Exchanges.
- f. The information and/or documents uploaded on the website shall be available for current financial year and for the preceding five financial years.
- g. Information and/ or Documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz.
- i. The information and/or documents may be arranged financial year wise with further segregation into four quarters of the financial year.
 - ii. All policies etc. or the information/ documents of a general nature can be clubbed together at one place.