Parinee Crescenzo, "A" Wing, 1102, 11th Floor,
"G" Block, Plot No. C38 & C39,
Behind MCA, Bandra Kurla Complex,
Bandra (E), Mumbai - 400 051, India.
Phone : 91-22-6124 0444 / 6124 0428
Fax : 91-22-6124 0438
E-mail : vinati@vinatiorganics.com
Website : www.vinatiorganics.com
CIN : L24116MH1989PLC052224

VINATI ORGANICS LIMITED

VINATI ORGANICS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL

Introduction & Statutory Authority:

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all listed entities. Pursuant to Regulation 9 and Regulation 30(8) of the Listing Regulations, the Board of Directors of Vinati Organics Limited (the "Company") has formulated this policy for the Preservation of Documents and Web Archival.

This Policy was originally effective December 1, 2015, and has been comprehensively reviewed and updated effective January 31, 2026.

Objective & Classification Framework:

The purpose of this Policy is to establish a binding framework for the preservation and archival of documents of the Company, as approved by the Board of Directors, classified into the following mandatory statutory categories:

- Category A: Documents whose preservation shall be permanent in nature;
- Category B: Documents with a preservation period of not less than eight (8) years after completion of the relevant transactions;
- Category C (Archival Mandate): Disclosures hosted on the Company's website pursuant to SEBI Listing Regulations, which shall be maintained on the website for a minimum period of five (5) years, and thereafter archived for a minimum period of three (3) years under the Company's Archival Framework.

Provided further that the Company may keep the documents specified above in electronic mode with adequate cybersecurity and backup safeguards.

Provision with Regard to Preservation of Documents under Various Laws:

The Company from time to time establishes retention or destruction policies/schedules for specific categories of records to ensure legal compliance and accomplish strategic objectives.

- Tax Records: Tax records include documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, GST, Income Tax, and Customs filings. Tax records shall be retained for at least eight (8) years from the date of filing the applicable return or completion of assessment, whichever is later.
- Employment & Personnel Records: Central & State statutes require the Company to keep certain recruitment, employment, statutory registers, and performance records.

Parinee Crescenzo, "A" Wing, 1102, 11th Floor,
"G" Block, Plot No. C38 & C39,
Behind MCA, Bandra Kurla Complex,
Bandra (E), Mumbai - 400 051, India.
Phone : 91-22-6124 0444 / 6124 0428
Fax : 91-22-6124 0438
E-mail : vinati@vinatiorganics.com
Website : www.vinatiorganics.com
CIN : L24116MH1989PLC052224

Employment and personnel records shall be retained for six (6) years or till the cessation/settlement of the employee, whichever is later.

- Board and Board Committee Materials: Minutes books of Board Meetings, Committee Meetings, and General Meetings shall be preserved permanently in perpetuity in accordance with ICSI Secretarial Standards (SS-1 and SS-2). Agenda clean copies and background papers shall be kept for eight (8) financial years.

- Press Releases / Public Filings & Disclosures: Permanent copies of all statutory press releases and public filings shall be retained by the Company. Public filings related documents shall generally be maintained for a period of eight (8) years or till the completion of any associated litigation/proceeding, whichever is later.

- Legal Files: Legal documents and court pleadings shall generally be maintained for a period of eight (8) years or till the final disposal of the case, whichever is later.

- Contracts & Agreements: Final execution copies of contracts entered into by the Company shall be retained for at least eight (8) years beyond the expiry or termination of the agreement.

- Electronic Documents & Email Archival: Electronic records and emails containing policy, financial, or contractual commitments shall be retained electronically or downloaded as archival files. Electronic files will be retained for the appropriate timeframe depending upon the underlying subject matter, supported by regular backup and recovery testing.

Archival Policy for Website Disclosures (Regulation 30(8)):

1. Active Hosting: All events, disclosures, and statutory information communicated to Stock Exchanges (BSE & NSE) under Regulation 30 of SEBI Listing Regulations shall be hosted on the official website of the Company (www.vinatiorganics.com) for a minimum period of five (5) years from the date of initial posting.

2. Archival Phase: After the expiry of the 5-year active period, the disclosures shall be moved to the website's "Archived Disclosures" section and maintained for a further period of at least three (3) years.

3. Disposal: After completion of the total 8-year period (5 years active + 3 years archived), the records may be removed/purged from the portal unless required for ongoing legal or regulatory proceedings.

General & Statutory Override:

Notwithstanding anything contained in this Policy, the Company shall comply with any additional retention requirements prescribed under any existing or future statutory amendments, MCA circulars, or SEBI notifications. In the event of any conflict between this Policy and applicable statutes, the statutory provisions shall automatically prevail over this Policy with immediate effect.

Parinee Crescenzo, "A" Wing, 1102, 11th Floor,
"G" Block, Plot No. C38 & C39,
Behind MCA, Bandra Kurla Complex,
Bandra (E), Mumbai - 400 051, India.
Phone : 91-22-6124 0444 / 6124 0428
Fax : 91-22-6124 0438
E-mail : vinati@vinatiorganics.com
Website : www.vinatiorganics.com
CIN : L24116MH1989PLC052224

VINATI ORGANICS LIMITED

Review & Amendments:

The Board of Directors reserves the right to review, amend, or modify this Policy in whole or in part as may be required from time to time.

Document History & Version Control

Version No.	Adopted / Approved By	Approval Date	Description / Summary of Changes
1.0	Board of Directors	October 31, 2015	Formulation of Policy on Preservation of Documents under Regulation 9 of SEBI (LODR) Regulations, 2015.
2.0	Board of Directors	January 31, 2026	Periodic Review of Policy.

****