

The logo watermark is a large, light blue circular emblem. Inside the circle, the letters 'S' and 'T' are stacked vertically in a light red color. The 'S' is positioned above the 'T'. The 'S' is a stylized, bold letter. The 'T' is also a stylized, bold letter. The entire logo is centered on the page.

**VIBHOR STEEL TUBES LIMITED**

**ARCHIVAL POLICY**

## 1. PREFACE

In terms of Regulation 30(8) of Listing (Obligations and Disclosures Requirements) Regulations, 2015, as mentioned below, the Company is required to frame an archival policy:

“The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under these regulations, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.”

In this context the policy on Archival of documents has been framed.

## 2. PURPOSE

This policy has been framed to abide by the Regulation 30(8) of Listing (Obligations and Disclosures Requirements) Regulations, 2015 (“**Regulations**”)

## 3. DEFINITIONS

- a) **Act:** means the Companies Act, 2013 including any amendment or modification thereof.
- b) **Board:** Board means Board of Directors of Vibhor Steel Tubes Limited.
- c) **Company/ VSTL:** means Vibhor Steel Tubes Limited.
- d) **Compliance Officer:** "Compliance Officer" means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- e) **Document:** “Document” means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- f) **Employees:** “Employees” shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.
- g) **Key Managerial Personnel:** “Key Managerial Personnel” shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed thereunder
- h) **Regulations:** “Regulations” shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

#### **4. ARCHIVAL POLICY**

In accordance with the provisions of the Regulations

- the information and event shall be disclosed to the Stock Exchange in accordance with the Company's policy on determination of materiality of events
- the information and event shall be hosted by the Company on its for a minimum period of five years
- the said information and event shall be destroyed according to the company's policy on preservation of documents.

#### **5. AUTHORITY FOR APPROVAL OF POLICY**

The Board shall have the authority for approval of this policy in pursuance to this Regulation.

#### **6. AUTHORITY TO MAKE ALTERATIONS TO THE POLICY**

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

#### **7. EFFECTIVE DATE**

The policy will be effective with effect from the date of approval by the Board.

#### **8. AMENDMENT**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors 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 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.

#### **9. DISCLAIMER**

Nothing contained in this Policy shall operate in derogation of any law for the time being in force or of any other regulation in force.

In any circumstance where the terms of this Policy differ from any applicable law governing the Company, such applicable law will take precedence over this Policy and procedures until such time as this Policy is

modified in conformity with the Applicable Law.

**For VIBHOR STEEL TUBES LIMITED**

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