

Sophia Exports Limited

ARCHIVAL POLICY

PURPOSE

This Policy is prepared in compliance with Regulation 30(8) and Regulation 46 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Listing Regulations”). This Policy aims to decide the process and manner of archiving the disclosures made to the Stock Exchanges under the Listing Regulations (the “disclosures”) which are hosted on the website of the Sophia Exports Limited (“Company”).

ARCHIVAL PROCESS

The Company shall disclose on its website all such events and information which have been disclosed to the Stock Exchanges under Regulation 30 of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a minimum period of five years from the date of disclosure to the Stock Exchanges. The aforesaid information which is more than 5 (five) years old will be archived from the website of the Company and shall be maintained by the Company for a further Archival period of 3 (Three) years using appropriate technology. These archives shall be made available on a written request made to the Director, Chief Executive Officer, Chief Financial Officer, Company Secretary & Compliance Officer or any other Key Managerial Personnel of the Company appointed under the Companies Act, 2013 (Act).

After five years, such disclosures shall be removed from the Company’s website and preserved in a secured server or at any other location in archives of the Company. Such disclosures shall be preserved in a logical manner to facilitate easy retrieval as and when required.

DISPOSAL OF DOCUMENTS AND RECORDS

Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed or purged in one of the following ways without the prior written approval of any one of the key managerial personnel of the Company appointed under the Act or as procedure specified by law:

- A. Recycle non-confidential paper records;
- B. Shred or otherwise render unreadable confidential paper records; or
- C. Delete or destroy electronically stored data.

ACCESS TO ARCHIVED DISCLOSURES

Sophia Exports Limited

The Director, Chief Executive Officer, Chief Financial Officer, the Company Secretary / Compliance Officer or any key managerial personnel of the Company appointed under the Act shall have access to all archived disclosures.

REVIEW / AMENDMENTS

The Company may review and revise this Policy from time to time. The Board of Directors of the Company shall have the right to review or amend this Policy from time to time so that the Policy remains complied with applicable legal requirements.

DISCLOSURE ON WEBSITE

The policy shall be continuously hosted on the website of the Company after the approval of the Board of Directors and after every amendment/ updating thereof.
