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## ARCHIVAL POLICY

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Under Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

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### 1. INTRODUCTION:

Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**") requires every Listed company to formulate an Archival policy for treatment of events /information disclosed to stock exchanges and hosted on the website of the company as per Materiality Policy after five years.

The Board of Directors ("the Board") of Dee Development Engineers Limited ("the Company") has adopted the following policy

### 2. PURPOSE & SCOPE:

The purpose of this document is to formulate a policy for archival of the information's and events communicated to the stock exchanges and hosted on the website under Regulation 30 of the SEBI(LODR) regulations, 2015.

### 3. DEFINITIONS:

"**Board of Directors**" or "**the Board**" means the Board of Directors of Dee Development Engineers Limited, as constituted from time to time.

"**Company**" means Dee Development Engineers Limited

"**Listing Regulations**" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

"**Policy**" means this Archival Policy.

"**Material Events**" means events as specified in Schedule III to the Listing Regulations and upon the occurrence of which a listed entity shall make disclosures to stock exchange(s) and host such disclosures on the listed entity's website.

### 4. ARCHIVAL PROCESS

- (i). All Events and information identified as material as per policy on Disclosure of material events/ information and communicated to the stock exchanges and hosted on the website of the Company shall be archived so as to be available for retrieval for such period as may be decided by the Managing Director of the Company. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company.
- (ii) Depending upon the nature, materiality, impact and relevance of the material event, the disclosure of such material event can continue to remain hosted on the Company's website for a longer period of time as decided by the Board from time to time.

#### Material events for their continued disclosure on the Company's website

Sl.	Material Event
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No.	
<b>Events which shall be disclosed without any application of the guidelines for materiality (Materiality Policy) as specified in sub-regulation Regulation 30(4) of SEBI(LODR) Regulations 2015.</b>	
1	Acquisition(s) (including agreement to acquire), Scheme of arrangement (amalgamation/ merger/ demerger/restructuring), or sale or disposal of any unit(s), division(s) or subsidiary of the listed entity or any other restructuring.
2	Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.
3	Revision in Rating(s).
4	Outcome of Meetings of the Board of Directors held to consider the following: a. dividends and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched; b. any cancellation of dividend with reasons thereof; c. the decision on buyback of securities; d. the decision with respect to fund raising proposed to be undertaken; e. increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched; f. reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to; g. short particulars of any other alterations of capital, including calls; h. Financial results; i. Decision on voluntary delisting by the listed entity from stock exchange(s).
5	Agreements which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.
6	Fraud/defaults by promoter or key managerial personnel or by listed entity or arrest of key managerial personnel or promoter.
7	Change in Directors, Key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary & Compliance Officer etc.), and Auditors
8	Appointment or discontinuation of share transfer agent.
9	Corporate debt restructuring.
10	One time settlement with a bank.
11	Amendments to memorandum and articles of association of listed entity, in brief.
12	Schedule of Analyst or institutional investor meet and presentations on financial results made by the listed entity to analysts or institutional investors.
<b>Events which shall be disclosed upon application of the guidelines for materiality (Materiality Policy) referred Regulation 30(4) of SEBI(LODR) Regulations 2015.</b>	
1	Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2	Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division.

3	Capacity addition or product launch.
4	Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
5	Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.
6	Effect(s) arising out of change in the regulatory framework applicable to the listed entity.
7	Litigation(s) / dispute(s) / regulatory action(s) with material impact.
8	Fraud/defaults etc. by directors (other than key managerial personnel) or employees of listed entity.
9	Options to purchase securities including any ESOP/ESPS Scheme.
10	Giving of guarantees or indemnity or becoming a surety for any third party.
11	Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
12	Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc.

The Board at its discretion may increase or decrease the time period for continued disclosure of any of the material events.

#### **4. Officer responsible:**

The Company Secretary and Compliance Officer of the Company shall be responsible for ensuring overall compliance of this Policy.

#### **5, Effective Date**

This policy is effective from September 07, 2023