



DIFFUSION ENGINEERS LIMITED

ARCHIVAL POLICY

ARCHIVAL POLICY FOR DISCLOSURES PURSUANT TO REGULATION 30 OF THE SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015

1. INTRODUCTION

The Securities and Exchange Board of India (SEBI) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations, 2015”) which shall be applicable to all listed entity with effect from December 01, 2015.

Regulation 30(8) of the Listing Regulations, 2015 is re-produced as under: Disclosure of events or information

The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, 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.

2. OBJECTIVE

The objective of this policy is to prescribe a policy for archival of disclosures of events or information which has been disclosed to the stock exchange(s) under Regulation 30 of the Listing Regulations, 2015 and hosted on the website of the Company.

3. APPLICABILITY AND EFFECTIVE DATE

This Policy shall be applicable to the Company with effect from 13th December 2023.

4. DEFINITIONS:

“**Act**” shall mean the Companies Act, 2013 and the rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“**Board of Directors**” or “**the Board**” means the Board of Directors of Diffusion Engineers Limited, as constituted from time to time.

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

“**Policy**” means the Archival Policy of the Company.

“**Material Events**” means events as specified in Schedule III to the Listing Regulations from time to time upon occurrence of which the Company shall make disclosures to stock exchange as per the ‘Policy for Determination of Materiality of Event/Information’ of the Company.

“**Stock Exchange**” means the exchange where shares of the Company are admitted for listing.

Any other term not defined herein shall have the same meaning as defined in the Act, Listing Regulations or any other applicable law or regulation to the extent applicable to the Company.

5. ARCHIVING OF DOCUMENTS WHICH ARE HOSTED ON COMPANY'S WEBSITE:

- A. All Documents generated, disclosed by the Company, on its website, for the purpose of shareholder communication, are the properties of the Company including archival material.
- B. Archival material of the Company shall not be destroyed or purged without the approval of the head of the department to which such archival material belongs.

Provided that nothing contained herein shall be deemed to lead to an exception except in case of an accidental deletion, or deletion due to any system flaw, virus, or any other deletion, inaccessibility or loss due to any reason other than deliberate and determinate deletion.

- C. Archival material so selected for preservation shall be sent to the Company archives in consultation with the head of concerned department, which thereafter may be removed as per the schedule provided herein.

6. ARCHIVAL REQUIREMENT:

- (1) The disclosures made to stock exchange under regulation 30 would be uploaded on the website of the Company.
- (2) The disclosure of material events shall be hosted on the Company's website for a minimum period of 5 (five) years from the date of posting.
- (3) Thereafter, the information would be archived under the heading "Past Events/ Information" and would be retained on the website for a period of 1 (One) year.

7. PROCEDURE:

The Company Secretary of the Company shall arrange for uploading on the website of the Company all the disclosures made by the Company in pursuance to the Regulation 30 of the Listing regulations as soon as possible.

All such events or information so disclosed on the website of the Company in pursuance to Regulation 30 of the Listing Regulations, 2015 shall be archived after the expiry of the five years from the date of such posting and moved to the location or place under - "Historic Material Events/ Information".

The events/ information so archived under "Historic Material Events/ Information" shall be preserved for a further period of three years or till the time such events or information are resolved or closed, whichever is later.

In addition to maintaining the records on the website, the Company shall also maintain the physical copies of such disclosure made to the stock exchanges(s) which shall be preserved for the period as per the Company's Policy on Preservation of Documents.

8. AMENDMENT AND REVIEW OF THE POLICY:

In case of there are any regulatory changes requiring modifications to the policy, the same shall be reviewed and amended with the approval of the Board of Directors. However, the amendment in the regulatory requirements shall be binding even if not incorporated in this Policy.

9. DISCLOSURES

Archival Policy shall be disclosed on the website of the Company i.e. <https://www.diffusionengineers.com/>.

**Adopted by Board of Directors in its meeting held on 13th December 2023.
Effective from 13th December 2023.**

**Prashant Garg
Chairman & Managing Director
DIN - 00049106**