

Turtlemint Fintech Solutions Limited

Archival Policy

Version Control History

Version	Date	Description of Changes	Prepared/Revised By
1.0		Initial creation of the policy document.	

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1. INTRODUCTION

In accordance with Regulation 30(8) and Regulation 46 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), listed companies are required to host specified information on their websites for a minimum of five (5) years. After this period, the archival policy of the listed entity, as disclosed on its website, will govern the retention and management of these records.

This Website Archival Policy ("**Policy**") was approved by the Board of Directors on _____ and will be effective from the date of the listing of the Company's equity shares.

Information, in both physical and electronic form, is a critical asset for any organization. This Policy ensures the systematic, cost-effective, and efficient management of archived records, supporting compliance and providing access to important data for future reference. It establishes a framework for retaining documents in accordance with regulatory requirements while maintaining operational efficiency.

2. DEFINITIONS

“Applicable Law” means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the Documents has been prescribed and is applicable to the Company.

“Archive/archiving” is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit, and preserving the historical memory and proof of an activity.

“Board”, in relation to the Company, means the collective body of the directors of the Company.

“Company” means Fintech Blue Solutions Private Limited.

“Records / Documents” includes and contains all relevant information relating to the Company and necessary documentations required to be maintained under the Applicable Law.

Any other term not defined herein shall have the same meaning as defined in the Act, the SEBI Regulations 2015 or any other applicable law or regulation.

3. OBJECTIVE OF THE POLICY

The key objectives of this Policy are as follows:

1) Proper Identification and Management: To identify and disclose all relevant information,

documents, and events on the Company's website, ensuring they remain accessible for a minimum period of five (5) years. After this period, the information will be archived, unless specified otherwise, and ensure that documents requiring continuous display, such as policies and codes of conduct, are not archived.

2) Security, Compliance, and Preservation: To ensure the security, verified access, and preservation of records and documents for legal, administrative, and historical purposes. This includes complying with all regulatory and legal requirements, as well as ensuring backup systems for continuity in case of disaster.

3) Efficient Disposal and Archival Process: To manage the retention, disposal, and archiving of records in accordance with authorized schedules, ensuring that outdated or expired information is deleted appropriately while maintaining an organized and accessible archive for accountability and historical preservation.

4. ARCHIVAL OF INFORMATION

For events or information disclosed under Regulation 30

All events or information disclosed under regulation 30 and any other Regulations to the Stock Exchanges on which the Company is listed and hosted on the Company's website shall be available on the Company's website for a period of five years or for such period as may be mandated under applicable law from the date of uploading them on the website. However, if the disclosure requires longer storage, the same will be considered appropriately.

For disclosures made under other applicable law:

- 1) All information required to be uploaded on the Company's website in pursuance of any other applicable law/statute / legislation / regulation, shall be hosted on the Company's website for such period as may be mandated by that statute / legislation / regulation etc.
- 2) In cases where the concerned applicable law /statute / legislation / regulation does not prescribe any period, the required data shall be hosted on the website for a minimum period of ____ year(s) from the date of uploading or until it is no longer relevant.
- 3) After the period as above has elapsed since the date of uploading of the information on the Company's website, the same may be removed from the website, if required.

Upon completion of the minimum retention period of five years, or any other period as prescribed by relevant Regulations and/or applicable laws, the Company shall archive the events or information for an additional period of ____ years. Documents that are no longer required or have fulfilled their retention period will be destroyed in accordance with the Company's document preservation policy.

In instances where a document/information is required to be archived for a longer period under applicable law, it will be retained for the duration specified by that law.

At its discretion, the Company will determine whether an archived document, if requested, will be made available, subject to the applicable laws.

5. REVISION OF POLICY

In case of any subsequent changes in the provisions of the Regulations or any applicable law, which make any of the clauses / provisions of this Policy inconsistent with law, the provisions of such applicable law shall prevail over this Policy.

6. AMENDMENT

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.

7. 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.