



ARCHIVAL POLICY

1. Preface

The Board of Directors (the "Board") of Today's Writing Instruments Limited (the "Company") has adopted the following policy (the "Policy") with regard to procedure on archiving documents.

This Policy has been formulated in accordance with the Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. Objective of the Policy

The objective of the Policy is to provide for a systematic procedure on archiving documents which are received or created in the course of business and which need to be maintained permanently in consonance with the Policy for Preservation of Documents.

3. Effective Date:

This Policy is effective December 1, 2015.

4. Responsibilities:

The Documents Retention Schedule of each department will be in accordance to the Policy on Preservation of Documents.

Individual staff members will be responsible for the management of archival records in their departments, with the advice and co-ordination of the respective Head of Department.

5. Process:

All records that are kept as archives will be included in the Documents Retention Schedule.

Physical records:

Documents which are to be stored in physical form will be archived as per the process listed herein below.

- Documents should be identified for archiving in consultation with the Reporting Manager/HOD
- Documents in physical form can be preserved in-house at the Company's godowns/factory or outsourced to specialized agencies, depending on the importance of the documents.
- While determining the method of preservation, the HOD should give due regard to the safety and confidentiality of the document
- The documents which are to be preserved should be stored in boxes which are to be barcoded with department name, file contents, name of authorised person.
- The list of contents should be pasted inside the box and outside the box with one copy to the HOD.
- In event of retrieval of any document from the storage, entry of such retrieval should be made on the list of contents along with date of retrieval and person to whom the documents are sent
- The Admin department of each location/ agency shall be responsible for the preservation and retrieval of the documents.

Electronic documents:

Documents which are disclosed on the website of the Company or which have been disclosed to stock exchange(s) under the SEBI (Listing Obligation and Requirements) Regulations 2015 shall be hosted on the website of the Company for a period of five years. Thereafter the documents shall be archived and the Compliance Officer of the Company shall have access to the same. Any person wishing to review the same should write to the Compliance Officer at secretarial@todays-pens.com.

Other electronic documents shall be archived by the IT Department of the Company in consultation with the respective department.

6. Communication of this Policy:

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

7. 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.

8. Scope and Limitation:

In the event of any conflict between the provisions of this Policy and the Companies Act, 2013; Listing Regulations or any other statutory enactments, the relevant act, the provisions of such Companies Act, 2013, Listing Regulations or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.