

Kosha

Fine Jewels Ltd.

(Formerly known as Kosha Fine Jewels Pvt. Ltd.)

ARCHIVAL POLICY FOR ANY MATERIAL EVENTS OR INFORMATION DISCLOSED TO STOCK EXCHANGE

1. PREAMBLE

Sub-Regulation 8 of Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (effective from 1st December, 2015), requires every Listed Company to formulate an Archival Policy.

2. PURPOSE & SCOPE

The purpose of this Policy is to archive any of the material of events or information which is disclosed by the Company to the Stock Exchange(s) prior to the period of five years in terms of Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 (Listing Regulations).

3. DEFINITION

- a. “**Company**” means Kosha Fine Jewels limited (Formerly known as Kosha Fine Jewels Private Limited).
- b. “**Board of Directors**” or “**the Board**” means the Board of Directors of Kosha Fine Jewels limited, as constituted from time to time.
- c. “**Policy**” means this Archival Policy for any material events or information disclosed to the stock exchange.
- d. “**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(s) and host such disclosures on the Company's website.



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4. POLICY

Any disclosure of events or information which has been submitted by the Company to the Stock Exchange(s) under **Regulation 30** of the Listing Regulations and Policy of the Company (Disclosed Information) will be available on the website of the Company www.kosha.co.in for a period of five years from the date of its disclosure. Disclosed Information which is over five years old will be archived from the website of the Company. Anyone intending to review Disclosed Information which is over five years old may write to Compliance Officer of the Company.

5. IMPLEMENTATION

1. The IT team of the Company shall be responsible for implementation of this policy and shall monitor the implementation. Backup and Retention of critical business data and applications shall be done periodically or in accordance with the provisions of applicable laws. Periodic restoration of backed up data shall be done to check for its availability, confidentiality & integrity.
2. IT Team shall retain the backup tapes pertaining to the Company's Financial and accounting data, reports, Employee Data, HR data, Legal Data etc. for at least eight years and ensure secure disposal upon expiry of such retention period in-compliance with laws applicable to the Company.
3. Electronic Media which has overdue retention period and which is no longer required for business purpose shall be disposed in secure manner such that data on it shall not be recoverable by any means.
4. All such events or information so disclosed on the website of the Company pursuant to the Listing Regulations, shall be archived after the expiry of their specified period from the date of such posting and moved to the location or placed under – "Archive".



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5. The events/information so archived under “Archive” shall be preserved for a further period of one year or till the time such events or information are resolved or closed, whichever is later.
6. In addition, to enhance data resilience and ensure continuity, backups of critical business data shall be maintained at a minimum of two separate locations, which may include a secure cloud-based environment or at secured physical locations, where feasible. This provision aligns with the principles of data availability, disaster recovery, and business continuity, as well as the requirements of the Company’s Archival Policy and applicable regulatory norms.

7. COMMUNICATION OF THIS POLICY

This Archival Policy shall be published and made available on the official website of the Company at www.kosha.co.in

This ensures easy accessibility for stakeholders, investors, regulatory authorities, and the general public, promoting transparency and compliance with Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations.

8. REVIEW OF THIS POLICY AND AMENDMENT

The Board shall review the Policy from time to time based on the changing needs and make suitable modifications as may be necessary. 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.



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In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

For Kōsha Fine Jewels Limited
(Formerly known as Kōsha Fine Jewels Private Limited)

V. N. Kothari
Viral Navinchandra Kothari
Managing Director
DIN: 09011478



Place: Mumbai
Date: 22/09/2025