

ARCHIVAL POLICY

Clause 1- Policy Statement

The Company is committed to establish and maintain information that meets its business needs, accountability requirements and stakeholder expectations.

Through this Archival Policy, the Company aims to have a central archive for historical records with permanent value. The Policy would provide a strong historical background to the organization and governance, its major developments, achievements and relationship with stakeholders.

Clause 2- Definitions

Archive: the whole body of records of continuing value of an organization or individual. Sometimes called 'Corporate Memory'.

Archives: those records that are appraised as having continuing value.

Electronic records: records communicated and maintained by means of electronic equipment.

Records: A “record” is any recorded or disclosed information or event or in any format or medium that has been created by or for the Company, or received by the Company in connection with the transaction of the organization’s affairs and operations.

Clause 3- Rationale of the Policy

This Policy emphasizes on the importance of preservation of the records and disclosures hosted on the website of the Company for historical purposes. Both electronic and paper documents are bound by the same legislative requirements and are subject to the same degree of confidentiality and care. Therefore electronic records must be managed as part of a comprehensive record keeping program. The Policy has been framed with an objective of maintenance of the Company’s historical data and records hosted on the website at one place, in known locations for making it accessible to staff, shareholders of the Company and its prospective investors.

Clause 4- Objective of the Policy

Through this Policy, the Company seeks to preserve and manage the records in a consistent and logical manner to achieve the below mentioned objectives:

- to meet the legal standards for protection, storage, and retrieval of the record;
- to use the space on the website efficiently;
- to minimize the cost of record retention; and

Clause 5- Scope of the Policy:

The Company's information and disclosures shall remain in public domain at the Archives section on the website of the Company <http://containerway.com> or the same shall be available at the Archival link at [●] after [●] years, from the time when the said information and disclosures were hosted on the Company's website. The records stored in the Archives may be in any format or medium. Any kind of information which is of significant and enduring value as per the management of the Company shall be made available in the Archive component. The records to be placed in the archives shall be full and accurate.

The Board of Directors, Compliance Officer and staff of the Company shall be familiar with this Policy.

Clause 6- Scope of Information in Archive

In General, As per this Archive Policy, every kind of information that is material for the business affairs of the Company or that is mandated to be disclosed on the website as per the provisions of applicable statutes; rules and regulation shall be preserved in the Archives section provided on the website of the Company for the ***minimum period of 5 years from the date of occurrence/ happening of an event or transaction as the case may be***

However the information pertaining to the following events are required to be hosted for the further specific periods:

- **Any case filed with the High Court or with SEBI:** Such documents are to be displayed on the website of the company minimum for the period of 5 years or till the completion of the case whichever is earlier. After that the last filing made to the Court or to SEBI are to be further displayed for the period of 5 years.
- **Amendments to MOA or AOA of the Company:** Any such amendment shall be of the permanent value and are required to be hosted on the company's website till the life of the Company.

- **Any Litigation/ Dispute/ Regulatory Action:** Documentation relating to such events shall be displayed for the minimum period of 5 years or the period for which such suit litigation/ dispute/ regulatory action pending and thereafter for the period of 2 years.
- **Options to purchase securities including any ESOP/ ESPS Scheme:**

Clause 7- Underlying Policy

In General, As per this policy the company is required to host on its website any information which is material for the business affairs of the Company or that is mandated to be disclosed on the website as per the provisions of applicable statutes or rules and regulations framed there under for the ***minimum period of 5 years from the date of occurrence/ happening of an event or transaction as the case may be.***

However the information pertaining to the following events are required to be hosted for the further specific periods:

- **Any case filed with the High Court or with SEBI:** Such documents are to be displayed on the website of the company minimum for the period of 5 years or till the completion of the case whichever is earlier. After that the last filing made to the Court or to SEBI are to be further displayed for the period of 5 years.
- **Amendments to MOA or AOA of the Company:** Any such amendment shall be of the permanent value and are required to be hosted on the company's website till the life of the Company.
- **Any Litigation/ Dispute/ Regulatory Action:** Documentation relating to such events shall be displayed for the minimum period of 5 years or the period for which such suit litigation/ dispute/ regulatory action pending and thereafter for the period of 2 years.
- **Options to purchase securities including any ESOP/ ESPS Scheme:**

Clause 8- Compliance Officer:

The Company Secretary of the Company shall be the Compliance Officer of the Company.

Clause 9- Authority & Responsibility:

It shall be the responsibility of the Compliance Officer, as designated by the Board of Directors of the Company, to keep on updating the Archive section on the website from time to time, by placing the records therein. The authority for determining the time within which the records will be moved to the Archive section shall be decided by the Compliance officer and reported to the Board of Directors of the Company. The records shall be moved to the Archives only after the approval of the Compliance officer.

Clause 10- Effective date and Policy Enforcement

The Policy shall be effective from 1st day of December, 2015.

Failure to comply with this Policy may result in punitive action against the Compliance Officer, including suspension or termination.

Clause 11- Review

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments.