



## ARCHIVAL POLICY

### BACKGROUND:

Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") requires every listed entity to disclose on its website, all such events or information which have been disclosed to the stock exchange(s) under the Listing Regulations for a minimum period of 5 (five) years and thereafter to archive the same as per the archival policy of the Company, which is also required to be hosted on the website of the Company.

Accordingly, the Board of Directors of Man Infraconstruction Limited ("MICL" or "Company") has adopted this Archival Policy ("Policy") for archival of events and information, after the period for which they were mandatorily required to be hosted on Company's website.

### OBJECTIVE:

This Policy aims to provide a framework for the effective archival of documents hosted on the website of the Company as required by the Listing Regulations. Through this Policy, the Company intends to establish a framework for ensuring greater accessibility of adequate and reliable information pertaining to the Company on a timely and regular basis for all its stakeholders.

### DEFINITIONS:

1. **"Applicable Laws"** means all applicable statutes, enactments, laws, ordinances, bye-laws, rules, regulations, guidelines, notifications and circulars having force of law, notices, and/or judgments, decrees, injunctions, writs or orders of any court, statutory or regulatory authority, tribunal, board or stock exchange in any jurisdiction as may be in force and effect during the subsistence of this Policy under which the archival of Documents and Records has been prescribed.
2. **"Company"** means Man Infraconstruction Limited.
3. **"Board of Directors"** or **"the Board"** means the Board of Directors of Man Infraconstruction Limited, as constituted from time to time.
4. **"Listing Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued there under, including any statutory modifications or re-enactments thereof for the time being in force.
5. **"Material Events"** means events as specified in Schedule III to the Listing Regulations and upon the occurrence of which a listed entity shall make disclosures to stock exchange(s) and host such disclosures on the listed entity's website.



6. “**Policy**” mean this Archival Policy.

7. “**Website**” means website of the Company i.e. <https://www.maninfra.com/>.

**POLICY:**

As mentioned above, disclosure of material events shall be hosted and retained on the Company’s website for a minimum period of 5(five) years. Depending upon the nature, materiality, impact and relevance of the material event, the disclosure of such material event can continue to remain hosted on the Company’s website for a longer period of time as decided by the Chairman & Managing Director and/ or CFO of the Company, from time to time.

The disclosures made to the stock exchanges will be provided by Company Secretarial Department to the concerned person for prompt uploading on the website of the Company and would be hosted in the website for five years period from the date of such hosting under Investors Relations section.

**DISCLOSURE OF THE POLICY:**

The Company shall disclose this Policy on its website. The necessary disclosure, if any, about the Policy will also be made as per the requirements of SEBI LODR Regulations, 2015 and the Companies Act 2013.

**FREQUENCY OF REVIEW OF THE POLICY:**

The Board is authorized to review/ change/amend this policy from time to time at its sole discretion and/or in pursuance of any amendments made in the Companies Act, 2013, SEBI LODR Regulations, 2015 and etc.

This Policy is intended to be in conformity with the SEBI LODR Regulations, 2015 as on the date of its adoption. However, if due to subsequent modifications in the SEBI LODR Regulations, 2015, the Act or any other applicable law, a provision of this Policy or any part thereof becomes inconsistent with the SEBI LODR Regulations, 2015, the Act, or any other applicable law, then the provisions of such laws, Listing Regulations as modified, shall prevail.

| Description                | Adoption Date | Approval by        |
|----------------------------|---------------|--------------------|
| Adoption of Revised Policy | 20.05.2025    | Board of Directors |

### Annexure 1

The Indicative list of information, whether material or not, which shall be published in the website of the Company under the "Corporate Announcement Section" and would be subject to the Archival Policy of the Company, are as under:

| Sr. No | Material Events (As per Para A of Part A of Schedule III)   |
|--------|---|
| 1.     | Acquisition(s) (including agreement to acquire), Scheme of Arrangement (amalgamation, merger, demerger or restructuring), sale or disposal of any unit(s), division(s), whole or substantially the whole of the undertaking(s) or subsidiary of the Company, sale of stake in associate company of the Company or any other restructuring.  |
| 2.     | Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc   |
| 3.     | New Rating(s) or Revision in Rating(s)  |
| 4.     | <p>Outcome of Meetings of the Board: The Company shall disclose to the Exchange(s), within 30 minutes of the closure of the meeting, held to consider the following:</p> <ul style="list-style-type: none"> <li>a) dividends and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched;</li> <li>b) any cancellation of dividend with reasons thereof;</li> <li>c) the decision on buyback of securities;</li> <li>d) the decision with respect to fund raising proposed to be undertaken;</li> <li>e) increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched;</li> <li>f) reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;</li> <li>g) short particulars of any other alterations of capital, including calls;</li> <li>h) financial results;</li> <li>i) decision on voluntary delisting by the listed entity from stock exchange(s):</li> </ul> <p>Provided that in case of board meetings being held for more than one day, the financial results shall be disclosed within thirty minutes of end of the meeting for the day on which it has been considered.</p> |
| 5.     | Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the listed entity), agreement(s)/treaty(ies)/contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof  |

# MAN INFRACONSTRUCTION LIMITED

## ARCHIVAL POLICY



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| 5A. | Agreements entered into by the shareholders, promoters, promoter group entities, related parties, directors, key managerial personnel, employees of the listed entity or of its holding, subsidiary or associate company, among themselves or with the listed entity or with a third party, solely or jointly, which, either directly or indirectly or potentially or whose purpose and effect is to, impact the management or control of the listed entity or impose any restriction or create any liability upon the listed entity, shall be disclosed to the Stock Exchanges, including disclosure of any rescission, amendment or alteration of such agreements thereto, whether or not the listed entity is a party to such agreements.  |
| 6.  | Fraud or defaults by a listed entity, its promoter, director, key managerial personnel, senior management or subsidiary or arrest of key managerial personnel, senior management, promoter or director of the listed entity, whether occurred within India or abroad  |
| 7.  | Change in directors, key managerial personnel (Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary etc.), senior management, Auditor and Compliance Officer  |
| 7A. | In case of resignation of the auditor of the listed entity, detailed reasons for resignation of auditor, as given by the said auditor, shall be disclosed by the listed entities to the stock exchanges as soon as possible but not later than twenty four hours of receipt of such reasons from the auditor  |
| 7B. | <p>Resignation of independent director including reasons for resignation: In case of resignation of an independent director of the listed entity, within seven days from the date of resignation, the following disclosures shall be made to the stock exchanges by the listed entities:</p> <p>I. The letter of resignation along with detailed reasons for the resignation as given by the said director.</p> <ol style="list-style-type: none"> <li>Names of listed entities in which the resigning director holds directorships, indicating the category of directorship and membership of board committees, if any.</li> <li>The independent director shall, along with the detailed reasons, also provide a confirmation that there is no other material reasons other than those provided.</li> <li>The confirmation as provided by the independent director above shall also be disclosed by the listed entities to the stock exchanges along with the disclosures as specified in sub-clause (a) and (b) above.</li> </ol> |
| 7C. | In case of resignation of key managerial personnel, senior management, Compliance Officer or director other than an independent director; the letter of resignation along with detailed reasons for the resignation as given by the key managerial personnel, senior management, Compliance Officer or director shall be disclosed to the stock exchanges by the listed entities within seven days from the date that such resignation comes into effect.   |
| 7D. | In case the Managing Director or Chief Executive Officer of the listed entity was   |

# MAN INFRACONSTRUCTION LIMITED

## ARCHIVAL POLICY



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|     | indisposed or unavailable to fulfil the requirements of the role in a regular manner for more than forty five days in any rolling period of ninety days, the same along with the reasons for such indisposition or unavailability, shall be disclosed to the stock exchange(s).   |
| 8.  | Appointment or discontinuation of share transfer agent  |
| 9.  | Resolution plan/ Restructuring in relation to loans/borrowings from banks/financial institutions including the following details: <ul style="list-style-type: none"> <li>i. Decision to initiate resolution of loans/borrowings;</li> <li>ii. Signing of Inter-Creditors Agreement (ICA) by lenders;</li> <li>iii. Finalization of Resolution Plan;</li> <li>iv. Implementation of Resolution Plan;</li> <li>v. Salient features, not involving commercial secrets, of the resolution/restructuring plan as decided by lenders</li> </ul>   |
| 10. | One time settlement with a bank   |
| 11. | Winding-up petition filed by any party / creditors.   |
| 12. | Issuance of Notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the listed entity  |
| 13. | Proceedings of Annual and extraordinary general meetings of the listed entity   |
| 14. | Amendments to memorandum and articles of association of listed entity, in brief   |
| 15. | <ul style="list-style-type: none"> <li>a) Schedule of analysts or institutional investors meet at least two working days in advance (excluding the date of the intimation and the date of the meet) and presentations made by the listed entity to analysts or institutional investors. Explanation: For the purpose of this clause 'meet' shall mean group meetings or group conference calls conducted physically or through digital means.</li> <li>b) Audio or video recordings and transcripts of post earnings/quarterly calls, by whatever name called, conducted physically or through digital means, simultaneously with submission to the recognized stock exchange(s), in the following manner: <ul style="list-style-type: none"> <li>I. the presentation and the audio/video recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier;</li> <li>II. the transcripts of such calls shall be made available on the website within five working days of the conclusion of such calls.</li> </ul> </li> </ul> |
| 16. | <p>The following events in relation to the corporate insolvency resolution process (CIRP) of a listed corporate debtor under the Insolvency Code:</p> <ul style="list-style-type: none"> <li>a) Filing of application by the corporate applicant for initiation of CIRP, also specifying the amount of default;</li> <li>b) Filing of application by financial creditors for initiation of CIRP against the corporate debtor, also specifying the amount of default;</li> <li>c) Admission of application by the Tribunal, along with amount of default or</li> </ul>   |

# MAN INFRACONSTRUCTION LIMITED

## ARCHIVAL POLICY



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|     | <p>rejection or withdrawal, as applicable;</p> <p>d) Public announcement made pursuant to order passed by the Tribunal under section 13 of Insolvency Code;</p> <p>e) List of creditors as required to be displayed by the corporate debtor under regulation 13(2)(c) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;</p> <p>f) Appointment/ Replacement of the Resolution Professional;</p> <p>g) Prior or post-facto intimation of the meetings of Committee of Creditors;</p> <p>h) Brief particulars of invitation of resolution plans under section 25(2)(h) of Insolvency Code in the Form specified under regulation 36A(5) of the IBBI (Insolvency Resolution Process for Corporate Persons) Regulations, 2016;</p> <p>i) Number of resolution plans received by Resolution Professional;</p> <p>j) Filing of resolution plan with the Tribunal;</p> <p>k) Approval of resolution plan by the Tribunal or rejection, if applicable;</p> <p>l) Specific features and details of the resolution plan as approved by the Adjudicating Authority under the Insolvency Code, not involving commercial secrets.</p> <p>m) Any other material information not involving commercial secrets.</p> <p>n) Proposed steps to be taken by the incoming investor/acquirer for achieving the MPS;</p> <p>o) Quarterly disclosure of the status of achieving the MPS;</p> <p>p) The details as to the delisting plans, if any approved in the resolution plan</p> |
| 17. | <p>Initiation of Forensic audit: In case of initiation of forensic audit, (by whatever name called), the following disclosures shall be made to the stock exchanges by listed entities:</p> <p>a) The fact of initiation of forensic audit along-with name of entity initiating the audit and reasons for the same, if available;</p> <p>b) Final forensic audit report (other than for forensic audit initiated by regulatory / enforcement agencies) on receipt by the listed entity along with comments of the management, if any</p>   |
| 18. | <p>Announcement or communication through social media intermediaries or mainstream media by directors, promoters, key managerial personnel or senior management of a listed entity, in relation to any event or information which is material for the listed entity in terms of regulation 30 of these regulations and is not already made available in the public domain by the listed entity.</p>  |
| 19. | <p>Action(s) initiated or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, in respect of the following:</p> <p>(a) search or seizure; or</p> <p>(b) re-opening of accounts under section 130 of the Companies Act, 2013; or</p> <p>(c) investigation under the provisions of Chapter XIV of the Companies Act, 2013;</p>  |

# MAN INFRACONSTRUCTION LIMITED

## ARCHIVAL POLICY



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|     | along with the following details pertaining to the actions(s) initiated, taken or orders passed: <ul style="list-style-type: none"><li>i. name of the authority;</li><li>ii. nature and details of the action(s) taken, initiated or order(s) passed;</li><li>iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;</li><li>iv. details of the violation(s)/contravention(s) committed or alleged to be committed;</li><li>v. impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.</li></ul>   |
| 20. | Action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, senior management, promoter or subsidiary, in relation to the listed entity, in respect of the following: <ul style="list-style-type: none"><li>(a) suspension;</li><li>(b) imposition of fine or penalty;</li><li>(c) settlement of proceedings;</li><li>(d) debarment;</li><li>(e) disqualification;</li><li>(f) closure of operations;</li><li>(g) sanctions imposed;</li><li>(h) warning or caution; or</li><li>(i) any other similar action(s) by whatever name called;</li></ul> along with the following details pertaining to the actions(s) initiated, taken or orders passed |
| 21. | Voluntary revision of financial statements or the report of the board of directors of the listed entity under section 131 of the Companies Act, 2013.  |

# MAN INFRACONSTRUCTION LIMITED

## ARCHIVAL POLICY



The Indicative list of information, which if considered "Material" in nature, shall be published in the website of the Company under the "Corporate Announcement Section" and would be subject to the Archival Policy of the Company, are as under:

| Sr. No | Material Events (As per Para B of Part A of Schedule III)   |
|--------|---|
| 1.     | Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.  |
| 2.     | Any of the following events pertaining to the listed entity:<br>(a) arrangements for strategic, technical, manufacturing, or marketing tie-up; or<br>(b) adoption of new line(s) of business; or<br>(c) closure of operation of any unit, division or subsidiary (in entirety or in piecemeal). |
| 3.     | Capacity addition or product launch   |
| 4.     | Awarding, bagging/ receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business  |
| 5.     | Agreements (viz. loan agreement(s) or any other agreement(s) which are binding and not in normal course of business) and revision(s) or amendment(s) or termination(s) thereof.   |
| 6.     | Disruption of operations of any one or more units or division of the listed entity due to natural calamity (earthquake, flood, fire etc.), force majeure or events such as strikes, lockouts etc.   |
| 7.     | Effect(s) arising out of change in the regulatory framework applicable to the listed entity.  |
| 8.     | Pendency of any litigation(s) or dispute(s) or the outcome thereof which may have an impact on the listed entity  |
| 9.     | Frauds or defaults by employees of the listed entity which has or may have an impact on the listed entity   |
| 10.    | Options to purchase securities including any ESOP/ESPS Scheme   |
| 11.    | Giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party.  |
| 12.    | Granting, withdrawal , surrender , cancellation or suspension of key licenses or regulatory approvals   |
| 13.    | Delay or default in the payment of fines, penalties, dues, etc. to any regulatory, statutory, enforcement or judicial authority   |
| 14.    | Any other information/event viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc.   |