

CARLSBERG INDIA LIMITED
(Formerly Carlsberg India Private Limited)
Preservation of Documents & Archival Policy

Policy approval date: 29 May 2026

PRESERVATION OF DOCUMENTS & WEB ARCHIVAL POLICY

1. Background

Regulations 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) require that all events or information disclosed to the Stock Exchanges (defined below) under Regulation 30 of the SEBI Listing Regulations shall be hosted on the website of the Company for a minimum period of five years and thereafter in accordance with the archival policy of the Company. This Policy shall be disclosed on the website of the Company.

Further, the Securities and Exchange Board of India, vide its Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023, read with Master Circular HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 dated 30 January 2026 as amended from time to time (“SEBI Circular on Reg. 30 Disclosures”), introduced a revised framework for disclosure of events or information under Regulation 30 of the SEBI Listing Regulations, inter alia, prescribing revised categorisation of events/information, timelines for disclosure and requirements for verification of market rumours. This Policy has been formulated in alignment with the requirements of the SEBI Listing Regulations and the SEBI Circular on Reg. 30 Disclosures for web-archival of the disclosures made on the website for information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations.

Additionally, the purpose of this document is to formulate a policy for preservation of documents in accordance with Regulation 9 of the SEBI Listing Regulations to provide a framework for their adequate protection and preservation as per Applicable Laws.

2. Purpose

The purpose of this Policy is to formulate a framework for the (i) archival of disclosures made on the website of the Company in respect of information and events communicated to the Stock Exchanges under Regulations 30 of the SEBI Listing Regulations and (ii) Preservation of documents under Regulation 9 of the SEBI Listing Regulations.

3. Definitions

“**Applicable Laws**” means securities laws defined under Regulation 2(1)(zf) of the SEBI Listing Regulations and other laws and statutes applicable to the Company, mandating archival/preservation of documents.

“**Board**” means board of directors of the Company as constituted from time to time.

“**Company**” means Carlsberg India Limited.

“**Company Secretary and Compliance Officer**” means the company secretary and compliance officer appointed by the Board.

“**Document/s**” includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

“**Managing Director**” means the managing director appointed by the Board and the shareholders of the Company.

“**Effective Date**” means the date on which this Policy shall become effective, i.e. 29 May 2026

“**Policy**” means this archival policy formulated by the Company for archival of the disclosures made on the website relating to information and events communicated to Stock Exchanges (*defined below*).

“**Stock Exchanges**” means the BSE Limited and the National Stock Exchange of India Limited.

“**SEBI Circular on Reg. 30 Disclosures**” means the Circular No. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023, read with Master Circular HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 dated 30 January 2026 issued by the Securities and Exchange Board of India, as amended, modified or supplemented from time to time.

4. Archival Process

- i. All disclosures of information and events communicated to the Stock Exchanges under Regulation 30 of the SEBI Listing Regulations, including disclosures made pursuant to the SEBI Circular on Reg. 30 Disclosures, shall be hosted on the website of the Company for a minimum period of five (5) years. Thereafter, such disclosures shall be archived and made available for retrieval for such additional period as may be determined by the Managing Director and the Company Secretary & Compliance Officer of the Company.
- ii. Any person intending to review archived information and events communicated to the Stock Exchanges may submit a written request to the Company Secretary and Compliance Officer of the Company.
- iii. This Policy shall be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.

- iv. Adoption of this Policy shall be communicated to the Stock Exchanges where the Company's equity shares are listed. This Policy shall also be disclosed on the website of the Company.

5. Preservation of Documents

Regulation 9 of the SEBI Listing Regulations mandates that a listed entity shall have a policy for the preservation of documents approved by its board of directors, classifying them in at least two categories as follows:

- i. Documents whose preservation shall be permanent in nature (Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company); and
- ii. Documents with a preservation period of not less than the time period stipulated in the SEBI Listing Regulations and other laws and statutes applicable to the Company from time to time after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for the said period. This is currently eight (8) years.

6. MODES OF PRESERVATION

- i. The Documents may be preserved either in physical form or electronic form. Where Documents are preserved in electronic form, such preservation shall comply with the requirements of the Information Technology Act, 2000, the Digital Personal Data Protection Act, 2023, and any guidelines or circulars issued by SEBI from time to time regarding electronic record-keeping, data localization, and cybersecurity.
- ii. The officer(s) of the Company who is / are generally expected to observe the compliance of requirements of Applicable Laws shall be the person(s) responsible to preserve the Documents (authorised person).
- iii. The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- iv. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorised person for preservation, to ensure integrity and confidentiality of the Documents and prohibit unauthorised access.
- v. The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

7. Disposal of Registers/Documents

Unless required to be preserved for a particular purpose like litigation or regulatory directive and upon expiration of the specified period of time for preservation as per applicable laws and/or SEBI Listing Regulations, the document may be destroyed by the Company after approval of the Company Secretary, Legal Head and the Chief Financial Officer ("CFO"). The Company shall maintain a register of records and documents destroyed, containing the particulars of the documents destroyed, the year to which it pertains, mode of destruction etc., each entry in this register shall be verified by the Company Secretary and countersigned by the CFO. The concerned employee shall be responsible for taking in to account the potential impact on the preservation/destruction of the documents in their work area and their decision to retain/preserve/destroy documents pertaining to their area of work. The modes of destruction of records can include methods like shredding, recycling, delete or destroy electronically stored data etc. or any other mode as permissible by law. This applies to both physical and electronic Documents.

8. Compliance

All employees of the Company are required to comply with the provisions of this Policy and the guidance manual. Failure to comply by any employee of the Company with this Policy and the guidance manual may result in disciplinary action by the Company, including suspension or termination of employment.

Any queries regarding this Policy may be referred to the Company Secretary & Compliance Officer of the Company.

9. Policy Review

The Board, subject to Applicable Laws, shall be entitled to amend, suspend or rescind this Policy at any time. Any difficulties or ambiguities arising in the interpretation of this Policy shall be resolved by the Board in line with the broad intent of the Policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy.