

DOCUMENT/RECORDS PRESERVATION AND ARCHIVAL POLICY

(Approved by the Board at its meeting held on 21st May 2025)

OF

LENSKART SOLUTIONS LIMITED

(Erstwhile known as Lenskart Solutions Private Limited)

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DEFINITIONS AND INTERPRETATION

1. Definitions

“Applicable Laws” shall mean all applicable laws, statutes, enactments, acts of central or state legislature, ordinances, rules, regulations, notifications, guidelines, directions, directives, policies, circulars, decisions and any other pronouncements issued in accordance with the Companies Act, SEBI Act, Listing Regulations or any other law applicable to the jurisdiction of India by any central, state, local, or other governmental, administrative or regulatory authority exercising executive, legislative, judicial, regulatory or administrative functions, including but not limited to RBI and Ministry of Corporate Affairs.

“Board” shall mean board of directors of the Company as constituted from time to time.

“Companies Act” shall mean the Companies Act, 2013, and rules and regulations issued thereunder, as amended from time to time.

“Company” shall mean Lenskart Solutions Limited (Erstwhile known as Lenskart Solutions Private Limited)

“Company Secretary and Compliance Officer” shall mean 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, whether in physical or electronic forms.

“Listing Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

“Policy” means this policy on archival of the disclosures made on the Company’s website of all information and events communicated to Stock Exchanges.

“Policy for Determination of Materiality of Events and Information” shall mean the policy for determination of materiality of events and information formulated pursuant to Regulation 30 of the Listing Regulations, and approved by the Board.

“RBI” shall mean the Reserve Bank of India.

“SEBI Act” shall mean the Securities and Exchange Board of India Act, 1992, as amended from time to time.

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

2. Interpretation

Unless defined expressly herein, all capitalized terms used in this Policy shall have the meanings assigned to them under the Companies Act, SEBI Act and rules and regulations thereunder.

INTRODUCTION

3. Background

In accordance with Regulation 30(8) of the Listing Regulations, the Company is required to formulate a policy on archival of documents, and disclose such policy on the website of the Company.

4. Objectives

The purpose of this Policy is to create and ensure a mechanism for archival of the disclosures made on the website of the Company for information and events communicated to the Stock Exchanges under Regulation 30 of the Listing Regulations and Regulation 46 of the Listing Regulations and in line with the Company's Policy for Determination of Materiality of Events and Information. The objective of this Policy is to determine the period for maintenance, preservation and disposal of physical and electronic Documents and records of the Company.

5. Modes of Preservation

The Documents may be preserved either in physical form or electronic form. The relevant head of departments of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person). 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. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure the integrity and confidentiality of the Documents and prohibit unauthorized access.

ARCHIVAL POLICY

6. Archival Policy

- 7.1. All the relevant disclosures of information and events communicated to the Stock Exchanges under Regulation 30 of the Listing Regulations will be hosted on the website of the Company under the section entitled "*Investor Relations*", either (i) for a period of eight years; or (ii) in case a document or information is required to be archived for a longer period as per Applicable Law, then the document or information shall be archived for such period as may be prescribed under the Applicable Law. After completion of the period prescribed under (i) or (ii) above, as may be applicable, the information and events shall be archived by the Company thereafter for a period of five years.
- 7.2. Subsequently, anyone intending to review the archived information and events communicated to the Stock Exchanges may write to the Company Secretary and Compliance Officer of the Company.
- 7.3. The Board is, subject to applicable laws, entitled to amend, suspend or rescind this Policy at any time. Any difficulties or ambiguities in the Policy will 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.
- 7.4. In the event of any conflict between the provisions of this Policy and of any relevant applicable law, such applicable law in force, from time to time, shall prevail over this Policy.
- 7.5. This Policy shall also be disclosed on the website of the Company.