

ARCHIVAL POLICY

BACKGROUND

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”). The Regulations come into force from December 1, 2015. The Regulations mandate listed entities to formulate an archival policy.

In this context, the following policy has been framed by the Board of Directors (“Board”) of **Winnay Immigration and Education Services Limited** (“Company”) at its board meeting. This Policy can be modified and or amended with the approval of the Board of Directors only.

PURPOSE

Regulation 30(8) requires the Listed Companies to disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a period of minimum 5 years and thereafter as per the archival policy of the Company, as disclosed on its website. Post the expiry of the above period of 5 years, the information would be archived and would be retained by the Company for a further period of 3 years or such other period as may be decided by the Board, from time to time. The purpose of this Policy is to disseminate equal, adequate and timely information to the shareholders through the website of the Company and to enable them to track the performance of the Company over regular intervals of time and provide sufficient information to enable investors to assess the current status of the Company.

SCOPE

The documents, information, disclosures, notices, policies as provided under the Regulations and the Act, which is required to be disclosed on the website, shall be uploaded on the website of the Company. The website of the Company shall be reviewed on regular intervals for ensuring that all the above mentioned disclosures are available on the website of the Company as required. These disclosures, unless otherwise mentioned in the Act itself, shall be hosted on the website for the five years’ period and thereafter shall be moved/transferred to Archives folders under the respective heads/sub-folders, in a way so that these can be searched easily as and when required by any person. The documents/disclosure shall be kept in the archive folders till such time as may be required by law.

EFFECTIVE DATE

This Policy is effective from the date of approval of the same by the Board of Directors of the Company.

POLICY REVIEW

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.

DISCLOSURES

The Company shall disclose the Policy on its website.