

SPA CAPITAL SERVICES LIMITED

Policy on Archival of Documents

[Pursuant to Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

Background

Pursuant to Regulation 30 (8) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**"), the Company is required to formulate an Archival policy.

Accordingly the Board of Directors of SPA Capital Services Limited (the "Company") has approved the Archival policy to provide guidelines for archival of records and documents as statutorily required.

Objective of the Policy

The objective of this policy is to disseminate adequate, equal and timely information to all the stakeholders 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.

Pursuant to Regulation 30 of the Listing Regulations, the Company shall disclose and host on its website all such events or information which has been disclosed to the Stock Exchanges under this regulation for a minimum period of 5 years. This Policy shall be disclosed on the Company's website www.spacapital.com in order to inform the stakeholders to facilitate them to retrieve past information under the Archival section as disclosed in the policy after the minimum period of five (5) years.

Archival of Information

The information that needs to be archived under regulation 30(8) of the Listing Regulation comprises Financial Data, Press Releases, and announcements on certain information and events, disclosed by the Company under the said regulation 30.

The information as statutorily required under the said regulations shall be hosted on the Company's website for a minimum period of five (5) years and the thereafter will be maintained under the archival section for a further period in the manner as deemed appropriate by the Company.

Amendments

The Board of Directors may review and revise the Policy from time to time. In case of any subsequent changes in the provisions of the Listing Regulations or any other Regulations which make any of the clauses/provisions in this Policy inconsistent with the Listing Regulations, the provisions of such Regulations shall prevail over this Policy.

Effective Date

The Policy as approved by the Board of Directors, shall be effective from the date of the approval by the Board of Directors at Board Meeting.