PHOTON CAPITAL ADVISORS LIMITED

ARCHIVAL POLICY FOR ANY MATERIAL EVENT/ INFORMATION DISCLOSED TO THE STOCK EXCHANGES

1. Preface

The Board of Directors (the "Board") of Photon Capital Advisors Limited (the "Company") has adopted the following Archival Policy with regard to any material events or information which are disclosed to the stock exchanges in terms of the company's policy for determination of Materiality of any relevant information.

2. Purpose of the Policy

The purpose of this policy is to archive any of the material events or information which are disclosed by the company to the stock exchanges prior to the period of five years in terms of regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 (Listing Regulations).

3. Policy

Any Disclosure of events or information which have been submitted by the company to the stock Exchange (s) under Regulation 30 of the Listing Regulations and policy of the company (Disclosed Information) will be available on the website of the company for a minimum period of 5 years from the date of its disclosure. Disclosed information which are over 5 years old will be archived from the website of the company. Anyone intending to review those Disclosed Information may write to compliance officer of the company.

4. Communication of this Policy

This policy will be placed on company's website. Any person desirous of viewing any information on this policy may visit the website.

5. Amendment

Any change in the policy shall be approved by the Board of Directors of the company. The board of directors shall have the right to withdraw and/ or amend any part of this policy or the entire policy, at any time, as it deems fit, or from time to time, and the decision of the board in this respect shall be final and binding.