

**GAEKWAR MILLS LIMITED**

**DOCUMENTS PRESERVATION & ARCHIVAL POLICY**

## 1. PREFACE

The Board of Directors (the “**Board**”) of Gaekwar Mills Limited (the “**Company**”) has adopted the Documents Preservation & Archival Policy (the “**Policy**”). This Policy has been formulated in accordance with Regulation 9 and 30(8) of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended, read with the circulars issued by the Securities and Exchange Board of India in this regard (the “**Listing Regulations**”).

## 2. PURPOSE OF THE POLICY

The purpose of this Policy is to ensure that the documents and records required to be prepared and disclosed to the stock exchanges be preserved for the period prescribed under the Listing Regulations.

## 3. TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The company shall maintain and preserve documents as specified hereunder:

**Category (A):** The documents of permanent nature (listed in **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

**Category (B):** The documents of the Company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in **Annexure 2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made there in from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years. For the purpose of this policy, documents may include: (i) books and papers; (ii) books of accounts; (iii) documents; (iv) register of company as defined in the Companies Act, 2013.

Further, the Company as it may deem fit and possible maintain above mentioned documents in electronic form to the extent possible from time to time.

## 4. AMENDMENT

Any change in the Policy shall be approved by the Board. The Board 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. In the event there is any inconsistency of the provisions of this Policy with the provisions of the Listing Regulations, the later shall prevail.

## **5. COMMUNICATION**

A copy of this Policy duly approved shall be placed before the Board and circulated among all the directors and employees of the Company. This Policy, as amended from time to time, shall be made available on the website of the Company.

## **6. ARCHIVAL**

- a. Information created in physical form shall be scanned and maintained in electronic form as well. The electronic communication shall be maintained on the Company server in year wise folders;
- b. Information which has been disclosed to stock exchange(s), such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter in accordance with this Policy, as the Board may decide. The Company shall also preserve information as per Annexure3.

- c. Place of preservation of physical Documents:-

The Documents will be preserved of the head office and respective local offices of the Company. Considering the space constraints, the management may decide to keep documents of third-party vendor for safe custody of documents.

- d. Individuals having right to access and retrieve information :-

The respective Head of Department of which the documents or information is related or any person authorized by the concerned Head of Department will have right to access and retrieve information.

- e. The Management will verify the archive policy periodically.

**Annexure1:**

**Documents whose preservation shall be permanent in nature:**

<b>Item No.</b>	<b>Records/Documents</b>
1.	Certificate of incorporation
2.	Certificate for commencement of business
3.	Memorandum and Articles of Association
4.	Agreements made by the Company with stock exchanges, depositories, etc.
5.	Minute books of general meetings, board and committee meetings as per Companies Act, 2013
6.	Register and index of members, debenture-holders, if any or other security holders, if any
7.	Register of contracts as per Companies Act,2013
8.	Register of charges as per Companies Act,2013
9.	Register of inter corporate loans and investments as per the Companies Act,2013
10.	Register of directors and key managerial personnel and its shareholding
11.	Register of disposal of records
12.	Register of documents executed under common seal of the Company
13.	Registers of investments in securities not held in the name of the Company
14.	Register of transfer/transmission of shares and issued of duplicate share certificates
15.	Such other records as may be required under any law from time to time

**Annexure 2:**

**Documents with preservation period of not less than eight years after completion of the relevant transactions:**

<b>ItemNo.</b>	<b>Records/Documents</b>
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Annual returns as per Companies Act, 2013
3.	Register of deposits as per Companies Act, 2013
4.	Register of allotment (from the date of each allotment) as per Companies Act, 2013
5.	Annual financial statements including annual accounts, directors report, - auditors report
6.	Vouchers/voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
7.	Income tax returns filed under Income Tax Act, 1961
8.	All notices inform MBP-1 received from Directors and KMPs along with any amendment thereto
9.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
10.	Copy of newspaper advertisement or publications
11.	Records relating to court cases/cb cases/police cases/civil suits/labor court cases/arbitration cases.
12.	Compliance reports received from any statutory authority
13.	Correspondences made with any statutory authority
14.	Register of power of attorneys, if any
15.	Forms and returns filed with RBI/MCA or with any other statutory authority

**Annexure3:**

<b><u>Sr no</u></b>	<b><u>Requirements</u></b>	<b><u>RecordType</u></b>	<b><u>Period</u></b>
1	Chapter IX of Accounts of Companies 128 (5) of the Companies Act, 2013	Booksofaccounts	Minimum 8 Years
		Allsalesandpurchasesof goods/servicesbythecompany	
		Allsumsofmoneyreceivedand expendedbythecompanyandthe mattersinrespectofwhichthese havetakenplace.	
		The assets liabilities of The andcompany	
		Thebooksofaccountstogetherwith the vouchers, invoices and other connected documents or records shallbepreservedingoodorder: Providedthatwhereaninvestigation hasbeenorderedinrespectofthe Company under Chapter XIV, the Central Government may direct that the books of account may be kept for suchlonger periodasit maydeem fit.	
Employee's salary, bonus and otherremuneration			
5	Legal proceedingsunder various Acts,asperIndianLa ws,including, but notlimitedtoconsum erprotectionAct,19 86 , Arbitrationand ConciliationAct, 1996, CivilProcedure Code1908,etc.	Preservationofrecords In the case of complaint, therecord containing main files withoriginalordersheetshallbepre servedforaperiodfiveyears.  Inthecaseofrecordsoffirstappeal and revision petitions, it shallbe preserved for three years from thedateofdisposaloftheappealorrevisi onasthe casemaybe.	5years

6	Information disclosed to Stock Exchanges	The information disclosed to stock exchanges shall be preserved for 8 Years	8 Years
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