



POLICY ON PRESERVATION OF DOCUMENTS

1. LEGAL FRAMEWORK

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

2. DEFINITIONS

"Act" shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

"Board of Directors" or "Board" shall mean the Board of Directors of Gujarat Foils Limited, as constituted from time to time.

"Company" shall mean Gujarat Foils Limited.

"Documents" shall mean all papers, records, registers, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

"Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

"Listing Regulations" Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

"Maintenance" means keeping documents, either physically or in electronic form.

"Preservation" means to keep the documents preventing them from being altered, damaged or destroyed.

"Register" means a register maintained under the Companies Act, 2013 or the SEBI Act.

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

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

Provided that all such modifications, amendments, additions, deletions in the



documents shall also be preserved permanently by the Company.

- B. The documents to be maintained and preserved for a 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, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

5. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

A copy of this policy shall be posted on the intranet and the web-site of the Company for all the Employees and Directors of the Company.

8. AMENDMENTS

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 this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.



Annexure 1

Indicative List of documents whose preservation shall be permanent in nature

Sr. No	Nature of Document(s)
1	Common Seal
2	Registration Certificates
3	Memorandum and Article of Association
4	Licenses & Statutory Approvals
5	Statutory Registers required under applicable laws
6	Audited financial statements
7	Minutes of General Meeting
8	Minutes of Board Meeting
9	Minutes of various Committee Meetings
10	Material Agreements/Contracts
11	Orders issued by Courts/Statutory bodies
12	Investment Documents/proofs including certificates etc.
13	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure 2

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

Sr. No	Nature of Document(s)
1	Books of Accounts
2	Annual Return(s)
3	Personnel Documents
4	Insurance Policies/ Claims under various policies
5	Correspondences with Departments/shareholders
6	Non-Statutory Registers/Documents
7	Films, Videos, CDs, DVDs, tapes etc.
8	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.