



ARCHIVAL POLICY ON DISCLOSURE HOSTED ON WEBSITE OF THE COMPANY

PURPOSE

This policy is prepared in compliance with Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “**Listing Regulations**”). This Policy aims to decide the process and manner of archiving the disclosures made to the Stock Exchanges under the Listing Regulations (the “**disclosures**”) which are hosted on the website of the Company.

ARCHIVAL PROCESS

The Company shall disclose on its website all such events and information which have been disclosed to the Stock Exchanges under Regulation 30 of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a minimum period of five years from the date of disclosure to the Stock Exchanges. The aforesaid information which is more than 5 (five) years old will be archived from the website of the Company and shall be maintained by the Company for a further Archival period of 3 (Three) years using appropriate technology. These archives shall be made available on a written request made to the Managing Director, Chief Financial Officer, Company Secretary/Compliance Officer or any key managerial personnel of the Company appointed under the Companies Act, 2013.

After five years, such disclosures shall be removed from the Company’s website and preserved in a secured server or at any other location in archives of the Company. Such disclosures shall be preserved in a logical manner to facilitate easy retrieval as and when required.

Disposal of documents and records

Documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed or purged in one of the following ways without the prior written approval of any one of the key managerial personnel of the Company appointed under the Companies Act, 2013 or as procedure specified by law:

- A. Recycle non-confidential paper records;
- B. Shred or otherwise render unreadable confidential paper records; or
- C. Delete or destroy electronically stored data.

ACCESS TO ARCHIVED DISCLOSURES

The Managing Director(s), Chief Financial Officer, the Company Secretary/Compliance Officer or any key managerial personnel of the Company appointed under the Companies Act, 2013 shall have access to all archived disclosures.

REVIEW / AMENDMENT

The Board may amend, abrogate, modify or revise any or all clauses of this Policy in accordance with the applicable provisions of the Listing Regulations and amendment thereto notified by the Securities and Exchange Board of India and/or Stock Exchanges, from time to time. However, any amendment in the Listing Regulations shall be binding even if not incorporated in this Policy.

DISCLOSURE

The details of such archival policy shall be disclosed on the Company's website i.e. www.gulshanindia.com. This policy is effective from **December 1, 2015**.

Last reviewed and updated in the Board Meeting held on February 21, 2020
