



GAURIK FASHIONS LIMITED
(Formerly known as “Gaurik Fashions Private Limited”)

POLICY ON PRESERVATION OF DOCUMENTS

1. PREFACE AND OBJECTIVE

The Board of Directors (**the “Board”**) of the Gaurik Fashions Limited (**the “Company”**) has approved the following policy for preservation of documents in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time (**“SEBI Listing Regulations”**).

As per Regulation 9 of the SEBI Listing Regulations, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode.

The objective of this Policy is to have a binding framework for the preservation of documents of the Company, as approved by the Board of Directors of the Company and aims to provide effective and efficient control over documents that needs to be preserved and its disposal after elapse of time while at the same time avoiding excessive inventory of documents. The Company, therefore, formulates this policy, in pursuance of Regulation 9 of the Regulations.

2. DEFINITIONS

- **“Applicable laws”** means securities laws defined under Regulation 2(1)(zf) of the SEBI Listing Regulations and means any law, rules, regulation, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs, The Institute of Company Secretaries of India or any other law, rules, regulations, circulars, guidelines or standards under which the preservation of the documents has been prescribed.
- **“Board”** means board of directors of the Company as constituted from time to time.
- **“Company”** means **Gaurik Fashions Limited**.
- **“Document/s”** means any papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, disclosures, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.
- **“Electronic Form”** means storage on any contemporary electronic device such as computer, laptop, compact disc, floppy disc, USB devices, servers, storage, emails, 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.
- **“Policy”** means this Policy on Preservation of Documents formulated by the Company.

3. DOCUMENTS TO BE PRESERVED

This Policy sets the standards for preservation of documents of the Company, broadly classified in the



following categories, which may be preserved, in physical and/or electronic mode.

- **CATEGORY A – DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE**

The following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- a. Registration Certificates
- b. Statutory Registers required under applicable laws
- c. Polices, Charters and Codes of the Company
- d. Minutes of the Board Meetings and Board Committees as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- e. Minutes of General Meetings (including AGMs) as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India.
- f. Register of directors and Key Managerial Personnel.
- g. Register of Renewed and Duplicate Share Certificates
- h. Register of Charges
- i. Register of Members along with the index (Form MGT-1)
- j. Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities) Form MBP-2.
- k. Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person) Form MBP-3.
- l. Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)
- m. Property Card, Ownership, records issued by government Authority
- n. The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company
- o. Material agreements/ contracts, which, even if terminated, may have an impact on business.
- p. Orders/judgement issued by Courts/statutory bodies and other background documents relevant for understanding such Orders
- q. Any other document, certificates, statutory registers that may be required to preserved permanently in terms the Companies Act, 2013 and/ or SEBI Regulations.

- **CATEGORY B – DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION.**

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

- a. Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.
- b. Books of Accounts



- c. Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013;
- d. Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- e. Disclosure of interest received from directors of the Company in the manner prescribed.
- f. Instrument creating a charge or modifying a charge.
- g. Changes to the Memorandum and Articles of Association.
- h. Employment record for the employees of the Company.
- i. Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India.
- j. Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- k. Documents as are required to be maintained under relevant laws relating to direct and indirect taxes.
- l. Marketing documents.
- m. Press releases.
- n. Legal documents including but not limited to contracts, legal opinions, orders passed by various courts and tribunals, documents relating to cases pending in any court, tribunal or authority.
- o. Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act, 2013 and/or SEBI Regulations.

• **CATEGORY C – GENERAL**

In addition to the documents mentioned in Category A and B above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing Rules/ Procedures/ Practices of the Company or as per the applicable Statutory/ Regulatory provisions in this regard.

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

4. MODES OF PRESERVATION

- The Documents may be preserved either in physical form or electronic form.
- The officer(s) of the Company who is / are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person). This is more particularly as set out in the guidance manual.
- The preservation of Documents should be in such a manner to ensure that there is no tampering,



alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

- The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure integrity and confidentiality of the Documents and prohibit unauthorized access.
- The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

5. DESTRUCTION OF DOCUMENTS

After the expiry of the retention period, the preserved Documents may be destroyed in such mode as may be recommended by the authorized person and approved by the Board of Directors of the Company. The details of Documents destroyed by the Company shall be recorded in the register of disposal of records to be kept by authorized persons who are disposing of the documents in the format prescribed in the guidance manual. This applies to both physical and electronic Documents. The documents may be destroyed as follows:

- Recycle non- confidential papers records,
- Shred or otherwise render unreadable confidential paper records; or
- Delete or destroy electronically stored data.

6. REVIEW

This Policy may be reviewed and amended from time to time by the Board, in line with the changing regulatory requirements, or in case the Company faces any practical difficulties in implementing the Policy.

7. COMPLIANCE

All employees of the Company are required to comply with the provisions of this Policy and the guidance manual. Failure to comply by any employee of the Company with this Policy and the guidance may result in disciplinary action by the Company, including suspension or termination of employment.

Any queries regarding this Policy may be referred to the responsible person, who is in charge of administering, enforcing and updating this Policy.

8. INTERPRETATION

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy and procedures.