



GOPAL SNACKS LIMITED

**POLICY ON PRESERVATION &
ARCHIVAL OF DOCUMENTS & RECORDS**

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS & RECORDS

1. PREFACE

- 1.1 Gopal Snacks Limited (**'Company'**) is a public limited company. The Company is in the business of Namkeen, Wafers, Fryums, Papad, Besan, Bakery products & Spices and snacks items or any other products (**"Products"**) marketed, distributed and sold by the Company under the various brands owned by the Company.
- 1.2 The Securities and Exchange Board of India (**"SEBI"**) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time (**"Listing Regulations"**). This Policy is in compliance with Regulation 9 read with Regulation 30(8) of Chapter III of Listing Regulations which mandates the listed entities to formulate a Policy for preservation and archiving of documents.
- 1.3 This Policy has been formulated by the management of the Company in consultation with relevant stakeholders and was approved by the Board at the Board Meeting held on 05/05/2023.

2. OBJECTIVE, SCOPE AND APPLICABILITY

- 2.1 The objective of this Policy is to determine the period for maintenance, preservation and disposal of physical and electronic documents and records of the Company.
- 2.2 The Policy covers all relevant Documents and Records generated during the course of operations of the Company.
- 2.3 The Policy will be applicable to the Company.

3. DEFINITIONS

- 3.1 **"Applicable Laws"** means any act, rules, regulations, circulars, guidelines or standards issued by the Central Government, Reserve Bank of India, Securities & Exchange Board of India, Ministry of Corporate Affairs, The Institute of Company Secretaries of India or any other statutory/regulatory authority, in which the preservation of Documents is prescribed, and are applicable to the Company;
- 3.2 **"Archival"** means accumulation/storage of historical records on server/network or at a physical place;
- 3.3 **"Board of Directors"** or **"Board"** means the Board of Directors of the Company, as constituted from time to time;
- 3.4 **"Company"** shall mean Gopal Snacks Limited;
- 3.5 **"Documents"** or **"Records"** mean a piece of written, printed, or electronic matter that provides

information or evidence or that serves as an official record of the Company and does not include multiple or identical copies;

- 3.6 **“Listing Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 together with the circulars issued there under, including any statutory modifications or re- enactments thereof for the time being in force;
- 3.7 **“Material Events”** means events as specified in Schedule III to the Listing Regulations and upon the occurrence of which a listed entity shall make disclosures to stock exchange(s) and host such disclosures on the listed entity’s website;
- 3.8 **“Policy”** shall mean the Policy on Preservation & Archival of Documents and Records; and
- 3.9 **“Preservation”** or **“preserve”** means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent them from being damaged or destroyed or tampered with.

4. **REGULATORY FRAMEWORK**

- 4.1 Regulation 9 of the Listing Regulations requires listed entities to have a Policy on Preservation of documents approved by its Board of Directors, classifying the documents in at-least two categories, which are as follows:
- A. **Category A (Permanent)**- Documents of permanent nature shall be maintained and preserved permanently by the Company; and
- B. **Category B (Not less than 8 years)**- Documents with preservation period of not less than eight years after completion of the relevant transactions shall be maintained and preserved for the relevant period by the Company.
- 4.2 Regulation 30(1) of the Listing Regulations requires every listed entity to make disclosures of any events or information which, in the opinion of the board of directors of the listed company, is material.
- 4.3 Regulation 30(8) Listing Regulations requires listed entities to disclose on its website all such events or information which has been disclosed to stock exchange(s) under Listing Regulations, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

5. **POLICY**

- 5.1 Preservation:
- A. The Company shall preserve all its records as per the requirements and provisions of the applicable laws and internal policies of the Company, in force.

- B. The relevant head of departments of the Company shall be responsible to ensure the maintenance and preservation of Documents and Records.
- C. Documents and Records which are required to be preserved by virtue of applicable laws and regulations shall be preserved either permanently or for such periods as may be mandated by applicable laws from time to time.
- D. Documents and Records which are required to be preserved for a period of not less than 8 (eight) years after completion of the relevant event (or such time period stipulated in the Listing Regulations and other laws and statutes applicable to the Company from time to time) shall be preserved for such stipulated time period as specified by the relevant head of departments of the Company from time to time.

5.2 Modes of preservation:

- A. The Documents may be preserved either in physical form or electronic form. The retention period of preservation of documents shall remain the same, irrespective of maintenance of documents in physical or electronic format or both.
- B. 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.
- C. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure the integrity and confidentiality of the Documents and prohibit unauthorized access.
- D. Pursuant to the provisions of the Listing Regulations, the listed company shall disclose on its website all such events or information which has been disclosed to stock exchange(s), and such disclosures shall be hosted and retained on the website of the Company for a minimum period of 5 (five) years from the date of its publication ("**Mandatory Hosting Period**") and thereafter, as per this Policy. Beyond the Mandatory Hosting Period, the disclosed information shall be archived for retrieval for a period of 2 (two) years ("**Archival Period**") considering the requirements of the Applicable Laws.
- E. The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

5.3 Modes of archival:

- A. The information on Material Events shall be displayed on the website of the Company for the Mandatory Hosting Period. 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 2 (Two) years using appropriate technology/or any other decided method. These archives shall be made available on a written request made to the Compliance Officer of the Company.

- B. Every function / unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy.
- C. Every function/ unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- D. The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

6. DISPOSAL OF DOCUMENTS AND RECORDS

6.1 Documents and records which are no longer required or upon the expiration of the specified period of time for preservation, unless required to be preserved for any purpose under the Applicable Laws, may be destroyed or purged in one of the following ways:

- A. **Physical Records:** Records made in physical form may be destroyed. The concerned Department Head will authorize destruction of the records and the same will be destroyed in the presence of a person authorized to do so, who shall ensure their destruction in accordance with practices that preserve the security of the information contained in them. Documents containing non-confidential information may be recycled;
- B. **Electronic Records:** Records made in electronic form may be deleted. The concerned Department Head will authorize destruction of the records and the same will be destroyed in the presence of a person authorized to do so, who shall ensure their destruction in accordance with practices that preserve the security of the information contained in them. The IT Department shall maintain a procedure to delete records no longer required to be retained, from back-up servers and for appropriately purging emails no longer required to be maintained.

7. COMPLIANCE

- 7.1 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.
- 7.2 The concerned departmental head will be responsible for the maintenance, preservation and destruction of Documents and Records pertaining to the respective Department.

8. PENALTY FOR NON-ADHERENCE OF THE CLAUSES OF THE POLICY

- 8.1 Non – adherence to any of the clause as mentioned in this Policy will attract penalty under the Applicable Laws.

9. IMPLEMENTATION AND REVIEW OF POLICY

- 9.1. The Board will be responsible for implementation and review of this Policy in whole or part.
- 9.2. Any amendment or waiver of any provision of this Policy should be approved by the Board of Directors of the Company.
- 9.3. In the event of any conflict between the provisions of this Policy and applicable laws, the provisions of applicable laws shall prevail and the part(s) so repugnant shall be deemed to be severed from the Policy and the rest of the Policy shall remain in force. Any subsequent amendment/ modification in the Applicable Laws shall automatically apply to this Policy.
