

GOLD ROCK INVESTMENTS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. BACKGROUND

The Securities and Exchange Board of India ("SEBI"), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Listing Regulations come into force from December 1, 2015. Regulation 9 of the Listing Regulations mandate listed entities to formulate a Policy for preservation of documents. It is in this context that the Policy on preservation of documents is being framed and implemented.

2. PURPOSE OF THE POLICY

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its documents effectively, and is obliged to create, maintain, preserve and dispose of documents as per this Policy. This policy categorizes the records that will be preserved indefinitely without any time limit and the records that will be preserved for specified period of time and outlines responsibilities to create, maintain and lawfully dispose of the records.

3. OBJECTIVE OF POLICY

The purpose 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, which shall classify them in at least two following categories as follows:

- i. Documents whose preservation shall be permanent in nature as given in **Annexure 1** attached to this Policy;
- ii. Documents with preservation period of not less than eight (8) years after completion of the relevant transactions as given in **Annexure 2** attached to this Policy.

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

While prescribing different time periods for preservation of records, the following aspects have been taken into account:

- a. Compliance with statutory and regulatory requirements.
- b. Requirements of SEBI/RBI/MCA officials to have access to certain records.
- c. Requirements of internal and external auditors to have access to certain records.

4. **DEFINITIONS**

“Company” means GOLD ROCK INVESTMENTS LIMITED;

“Board” means the Board of directors of the Company or its Committee;

“Listing Regulations” means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015;

“Policy” means this Policy for Preservation of Documents of the Company;

“Document(s)” Documents means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.

5. **GOVERNING LAWS**

This policy shall be governed by the Companies Act 2013, SEBI Act, Rules and Regulations, Secretarial Standards, Tax Laws and all other applicable laws for the time being in force.

The authority and responsibility for the above said shall be vested with the Company secretary, Chief financial officer or any other senior officer which may be decided by the Board.

6. **MODE OF PRESERVATION, MAINTENANCE AND STORAGE**

The Documents may be preserved in physical form or Electronic Form.

All the documents maintained in physical form are to be preserved by the Respective Departmental Heads of the Company.

Electronic version(s) of all of documents are to be maintained within the Company's centralized electronic record software database, which is maintained by the IT Services Department.

The preservation of Documents should be such as 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 Respective Departmental Heads of the Company, so as to ensure integrity of the Documents and prohibit unauthorized access.

7. **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 or for short term use only.

This applies to both Physical and Electronic Documents.

8. **AMMENDMENTS**

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.

Annexure 1

Documents whose preservation shall be permanent in nature

1. Registration Certificates obtained from various statutory authorities
2. Incorporation documents
3. Licenses & Statutory Approvals
4. Statutory Registers required under applicable laws
5. Memorandum and Articles of Association
6. Minutes of General Meeting, Board Meeting and Various Committee Meetings as per Companies Act, 2013
7. Material Agreements/Contracts /Deeds
8. Orders issued by Courts/Statutory bodies
9. Any other documents 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 (8) years after completion of the relevant transactions

1. Annual Returns as per Companies Act, 2013.
2. Annual financial statements including:
 - Annual accounts
 - Directors report
 - Auditors report
3. Personnel Documents
4. Correspondences with Departments/shareholders
5. Non-Statutory Registers/Documents
6. Forms and returns filed with RBI/MCA or with any other statutory authority
7. All Emails received from Internal and External Sources related to business issues
8. Any other document as may be required to maintain not less than eight (8) years in terms of applicable law(s), maintained and preserved from time to time.