

# POLICY FOR PRESERVATION OF DOCUMENTS

## 1. PREFACE

The Board of Directors of Godfrey Phillips India Limited has adopted the following policy with regard to preservation of Documents as necessitated under Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## 2. DEFINITIONS

- (i) **“Board of Directors” or “Board”** : **Board of Directors or Board** shall mean the Board of Directors of Godfrey Phillips India Limited, as constituted from time to time.
- (ii) **“Company”** Company shall mean **“Godfrey Phillips India Limited”**.
- (iii) **“Documents”** Documents shall mean all papers, records, 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.
- (iv) **“Listing Regulations”** Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

## 3. PURPOSE

The purpose of this policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under Regulation 9 of Listing Regulations.

## 4. TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

For the purpose of managing, storing and preservation, the documents of the Company broadly classified in the following two categories:

- (i) The documents of a permanent nature including any modification(s), amendment(s), addition(s), deletion(s) or other change(s) made thereto, shall be maintained and preserved permanently by the Company. (listed in **Annexure 1**)
- (ii) The documents including any modification(s), amendment(s), addition(s), deletion(s) or any change(s) made thereto, shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions. (listed in **Annexure-2**)

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

## **5. 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.

## **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). The details of Documents destroyed shall be recorded in the Register of Disposal of Records (listed in **Annexure - 3**) and shall be periodically placed before the Board.

This applies to both Physical and Electronic Documents.

## **7. COMMUNICATION AND DISSEMINATION OF THE POLICY**

A copy of this policy shall be posted on web-site of the Company namely [www.godfreyphillips.com](http://www.godfreyphillips.com)

## **8. 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.

## **9. AMENDMENTS**

Any Change in the Policy shall be approved by the Board of Directors of the Company.

**Documents whose preservation shall be permanent in nature**

1. Registration Certificates
2. Licenses & Statutory Approvals
3. Statutory Registers required under applicable laws
4. Audited financial statements
5. Minutes of Board, Committee and General Meeting
6. Material Agreements/Contracts
7. Orders issued by Courts/Statutory bodies
8. Investment Documents/proofs including certificates etc.
9. 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**

1. Books of Accounts
2. Annual Return(s)
3. Excise, Income Tax, VAT and Service Tax Records
4. Personnel Documents
5. Insurance Policies/ Claims under various policies
6. Correspondences with Departments/Banks/shareholders
7. Non-Statutory Registers/Documents
8. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

