



GULF OIL LUBRICANTS INDIA LIMITED

# **POLICY ON PRESERVATION OF DOCUMENTS**

## **INTRODUCTION:**

This Policy is framed in accordance with the requirement under Regulation 9 of the Security Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (hereinafter referred as "Listing Regulations").

The purpose of this Policy is to ensure that all necessary documents and records of the Company are adequately protected and preserved as per statutory requirements of applicable laws, and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving documents and records which are required to be maintained as per applicable statutory and regulatory requirements.

## **EFFECTIVE DATE:**

This policy is effective from December 1, 2015.

## **SCOPE:**

This policy shall govern the procedure of preservation of documents as required to be maintained under statutory and regulatory requirements viz., the Companies Act 2013, and rules issued thereunder from time to time, the Secretarial Standards, the Listing Regulations, the Security Exchange Board of India (Prohibition of Insider Trading) Regulations 2015, the Security Exchange Board of India (Substantial Acquisition and Takeover) Regulation 2011 and any other applicable regulations under the Security Exchange Board of India Act 1992 and amendments thereto from time to time. (hereinafter referred as Act/Regulations).

## **RESPONSIBILITY:**

The respective Functional Heads shall be responsible to maintain the records and authorised to destroy the record by following this policy.

## **PRESERVATION OF DOCUMENTS:**

### **The preservation of Documents shall be done in the following manner:**

1. Certain Documents shall be preserved permanently, as required by applicable laws.
2. Certain Documents shall be preserved for a period of not less than 8 years, as required by applicable laws.
3. Where there is a period lesser than 8 years for which a Document is required to be preserved as per applicable laws, for such shorter period as required by applicable laws.
4. In case of any other Document, for such period as may be decided by the respective Functional Head after the completion of relevant transaction / event, taking a considered view about its relevance.
5. An indicative list of Documents and the time-frame of their preservation is provided in Annexure-A.

## **MODES OF PRESERVATION :**

1. The Documents may be preserved in:  
Physical Form or  
Electronic Form
2. The physical Documents preserved may be converted, whenever required or felt necessary, into Electronic Form and vice versa, to ensure ease in maintenance of records and efficient utilization of space.

3. 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.
4. An external agency can be used for the purpose of preserving Documents.
5. The preserved Documents shall be accessible at all reasonable times. Access may be controlled by the respective Functional Head, so as to ensure integrity of the Documents and prohibit unauthorized access.

#### **AUTHENTICITY:**

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

#### **DISPOSAL AND DESTRUCTION OF RECORDS:**

Subject to the provisions of the Companies Act 2013 read with rules made thereunder, the documents may be destroyed after the expiration period mentioned in the annexures. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both physical and electronic documents. The documents may be destroyed as follows:

- a. Recycle Non confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records
- c. Delete or destroy electronically stored data

#### **INTERPRETATION:**

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

#### **AMENDMENTS:**

The board of directors shall have power to amend any of the provisions of this policy, substitute any of the provisions with a new provision or replace this policy entirely with a new policy according to subsequent modification(s) / amendment(s) to Regulations.

**Last amended on November 02, 2021**



Indicative list of Documents whose preservation shall be permanent in nature:

1.	Memorandum of Association and Articles of Association
2.	Register of members along with index
3.	Register of Foreign members
4.	Register of charges
5.	Register of renewed and duplicate share certificates
6.	Register of contracts / arrangements in which the directors are interested
7.	Register of directors and KMP and their shareholdings
8.	Register of loans, guarantees, security and acquisition of securities made by the Company
9.	Register of investments not held in the name of the company
10.	Minutes of General meetings, Board meetings and Committee meetings
11.	Files relating to premises viz. Title Deeds/ Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
12.	Certificates obtained from various statutory authorities
13.	Authorization / licenses obtained from any statutory authority
14.	<p>For unpaid or unclaimed Dividend transferred to Investor Education and Protection Fund (IEPF):</p> <p><b>(a) Record of shareholders &amp; Dividend</b>            Following details in respect of dividend that remained unpaid or unclaimed for a period of seven years and has been transferred to the Investor Education and Protection Fund (IEPF) constituted under section 125 of the Companies Act, 2013:</p> <ul style="list-style-type: none"> <li>• Name of the shareholder,</li> <li>• Father`s / Husband`s name</li> <li>• Last known address,</li> <li>• Amount transferred to IEPF,</li> <li>• Folio no./ DP ID &amp; client ID,</li> <li>• Certificate number, beneficiary details, etc.</li> <li>• Date of declaration of Dividend</li> </ul> <p><b>(b) Record of Claims (from amount transferred to IEPF)</b>            Following information shall be preserved:</p> <ul style="list-style-type: none"> <li>• Claim Form submitted by claimant</li> <li>• All Documents submitted by claimant</li> <li>• Verification Report submitted by the Company to IEPF Authority</li> </ul>
15.	<p>For unpaid or unclaimed Dividend transferred to Investor Education and Protection Fund (IEPF):            For shares transferred to Investor Education and Protection Fund (IEPF):</p> <p><b>(a) Details of shares and dividend</b></p> <ul style="list-style-type: none"> <li>• Name of the shareholder</li> <li>• Father`s / Husband`s name</li> <li>• Last known address</li> <li>• Folio No/ DP ID&amp; client ID,</li> <li>• Category &amp; kind of shares,</li> <li>• Number of shares,</li> <li>• Nominal value of shares,</li> <li>• Certificate number &amp; distinctive number (in case of physical shares)</li> <li>• Unpaid dividend (consecutive period and amount)</li> <li>• Date of transfer to IEPF</li> </ul> <p><b>(b) Record of Claims for shares transferred to IEPF Following information shall be preserved:</b></p> <ul style="list-style-type: none"> <li>• Claim Form submitted by claimant</li> <li>• All Documents submitted by claimant</li> <li>• Verification Report submitted by the Company to IEPF Authority</li> </ul>

Indicative list of Documents to be preserved for not less than 8 years after completion of the relevant transaction(s):

1.	Books of accounts and tax records viz. documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax authorities, shall be maintained for a period of 8 (eight) years from end of the relevant assessment year or till the disposal of the appeal against any demand by the highest authority, whichever is later
2.	Register of deposits
3.	Register of debenture holders or any other security holder along with index of name
4.	Disclosure and Notice by a Director of his interest
5.	Register of attendance of directors at the meetings of the board and committee thereof from the date of last entry made therein
6.	Notice, Agenda, Notes on Agenda and related papers of Board and Committee meetings
7.	Instrument creating charge or modification
8.	Scrutinizers report on postal ballot and general meetings
9.	Forms and returns filed with RBI/MCA or with any other statutory authority
10.	Structure Digital Database as per SEBI (Prohibition of Insider Trading) Regulations, 2015 after completion of the relevant transactions and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings
11.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases
12.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013

Indicative list of Documents to be preserved for less than 8 years after completion of the relevant transaction(s) as normal administrative practice:

1.	Information collected at time of resignation of Designated person, including updated address and contact details in lines with SEBI (Prohibition of Insider Trading) Regulations, 2015 for a minimum period of 5 years
2.	Disclosures made under Regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015 for a minimum period of 5 years
3.	All certificates surrendered to a company shall immediately be defaced by stamping or printing the word "cancelled" in bold letters to be kept for atleast 3 years
4.	Tape recording(s) or other electronic recording mechanism used for Board/committees/shareholders meetings held through video - conferencing or audio – visual means atleast upto the time of completion of audit of that particular year.
5.	All contracts, agreements, letters related to appointment of directors, managerial personnel's, auditors etc. and/ or such other statutory office as referred in Act/ Regulations.

*Where the preservation period of documents is not included in the above identified categories, such period shall be determined by the application of the general guidelines affecting document preservation and any other pertinent factors.*

*Hence, any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the respective head of the department in writing.*

**Last amended on November 02, 2021**