

GFL Limited

POLICY FOR PRESERVATION OF DOCUMENTS

1. Preface

The Board of Directors (the "Board") of GFL Limited (the "Company") has approved the following Policy of the Company for preservation and disposal of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as "the Documents") (The Policy). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

2. Purpose of the Policy

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements 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 the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

3. Administration

Attached as **Appendix A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

4. Procedure for disposal of Documents

The Documents of the Company which are no longer required as per the time schedule prescribed in the **Appendix A** can be destroyed. The Administrator shall direct Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under **Appendix A**. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at **Appendix B**.

5. Suspension of Documents disposal in the event of Litigation or Claims

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

6. Communication of this Policy

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company. This Policy shall also be posted on the web-site of the Company.

7. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

APPENDIX A – DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is organised as follows:

Section Topic

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Correspondence and Internal Memo
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records

A: Corporate Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Common Seal	Permanent
2	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3	Statutory Registers	Permanent
4	License and Permissions	Permanent
5	Statutory Forms except for routine compliance	Permanent
6	Scrutinizers Reports	Permanent
7	Register of Members	Permanent
8	Index of Members	Permanent
Documents to be retained for a minimum period of 8 years		
9	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
10	Board Agenda and supporting documents	8 years from the date of the Board Meeting
11	Attendance Register	8 Years from the date of the Board Meeting
12	Office copies of Notice of General Meeting and related papers	8 Years from the date of the General Meeting
13	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8 Years from the date of the Board Meeting / Committee Meeting
Miscellaneous		
14	Register of Debenture-holders, if any	15 years after the redemption of debentures
15	Index of debenture-holders, if any	15 years after the redemption of debentures

B: Accounts and Finance		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Annual Audit Reports and Financial Statements	Permanent
Documents to be retained for a minimum period of 8 / 17 years as given below		
2	Annual Plans and Budgets	8 years from the end of the Financial Year to which they relate to
3	Books of Accounts, Ledgers and Vouchers	17 years from the end of the Financial Year to which they relate to
4	Bank Statements	17 years from the end of the Financial Year to which they relate to
5	Investment Records	17 years from the end of the Financial Year to which they relate to
Miscellaneous		
6	General Correspondence	3 years from the end of the Financial Year to which they relate to

C: Tax Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Tax Exemption and Related documents	Permanent
2	Assessment and Appeal Orders	Permanent
Documents to be retained for a minimum period of 17 years as given below		
3	Excise / Custom Records	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later
4	Tax Deducted at Source Records	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later
5	Income Tax papers	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later
6	Service Tax papers	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later
7	Any other Direct or Indirect Tax Laws	17 years from the end of the Financial Year to which they relate to or after the completion of the Litigation/s in the matter, if any, whichever is later

D: Legal Files and Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Court Orders	Permanent
Documents to be retained for a minimum period of 8 years		
2	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts
3	Legal Memoranda and Opinions including	8 years after the close of matter

	subject matter files	
4	Litigation files	8 years after close of the Litigations

E: Property Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Original Purchase and Sale Agreement	Permanent
2	Property Card, Index II, Ownership records issued by Government Authority	Permanent
Miscellaneous		
3	Property Insurance	8 years from the expiry of the policies

F: Project		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Project Technical Know-how Documents	Permanent
Documents to be retained for minimum period of 8 years		
2	Project Documents and Related correspondence (including any proposal of the Project and its approval)	8 years from the end of the Financial Year to which they relate to

G: Correspondence and Internal Memo		
Sr. No.	Records Type	Preservation period
Documents to be retained for minimum period of 8 /17 years		
1	Those pertaining to non-routine matters or having significant lasting consequences	17 years from the end of the Financial Year to which they relate to
Miscellaneous		
2	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. <ul style="list-style-type: none"> • Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; • Letters of general enquiry and replies that complete cycle of correspondence; • Letter of compliant requesting specific actions that have no further value after change of name or address; • Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary. 	8 years from the end of the Financial Year to which they relate to

H: Insurance Records		
Sr. No.	Records Type	Retention period
Documents to be retained for a minimum period of 8 years		
1	Insurance Policies	8 years from the expiry of the Policies
2	Inspections Reports	3 years from the end of the Financial Year in which the claim is settled
Miscellaneous		
3	Claims records	3 years from the end of the Financial

		Year in which the claim is settled
4	Group Insurance Plans	3 years from end of the Financial Year to which they pertain

I: Personnel Records		
Sr. No.	Records Type	Retention period
Documents to be retained for a minimum period of 8 years		
1	Payroll Registers	8 years from the end of the Financial Year to which they relate to
2	Bonus, Gratuity and other Statutory Records	8 years from the end of the Financial Year to which they relate to
3	Time office Records and Leave Cards	8 years from the end of the Financial Year to which they relate to
4	Unclaimed Wages Records	8 years from the end of the Financial Year to which they relate to
5	Employees Information Records	8 years from the date of separation of the concerned employee
Miscellaneous		
6	Employees Medical Record	8 years from the date of separation of the concerned employee

J: Electronic Records	
1.	<p>Electronic Mail</p> <ul style="list-style-type: none"> All e-mails received from Internal Sources are retained for 3 years and External Sources are to be retained for 8 years, from the year in which these emails were received / sent. Employees will strive to keep their e-mails related to business issues. All Emails related to business issues should be downloaded to a server or user directory on server. Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources. All e-mails of Employees which are important should be copied to the employees' folder.
2.	<p>Web Page Files : Internet cookies</p> <p>All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.</p> <p>The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy. Each month the Company will run backup copy of all Electronic files including email on servers. This backup is safeguard to retrieve lost information within 1 year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.</p> <p>In certain cases document will be maintained both paper and electronic form.</p>

