

POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

1. INTRODUCTION

This policy has been adopted by GMM to establish a framework needed for effective preservation, safe-keeping and maintenance of documents and records of GMM in accordance with the provisions of the Companies Act, 2013 and the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. ("Listing Regulations") This Policy is further intended to provide guidance to the senior management, employees and personnel working in GMM and acting or carrying on operations on its behalf and is framed for the purpose of systematic identification, categorization, maintenance, review, retention and disposal of documents received or created in the course of business. The policy contains guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. STATUTORY MANDATE

Under the Listing Regulations, the Company has a strategic objective of ensuring that significant documents as set out below and more particularly in the Annexure (Documents) are safeguarded and preserved to ensure longevity of priority documents including in electronic form.

3. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

Based on the recommendation of the management of the Company, the Board of Directors have classified the following documents to be retained and preserved (Documents):

Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law. Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is "current". In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance.

Documents that need to be preserved / retained permanently	Doc - 1
Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or Listing Regulations	Doc - 2
Documents to be preserved electronically and archived when necessary	Doc - 3
Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case	Doc - 4
Emails of all employees in the grade M3 (E6) and above for a period of 3 years	Doc - 5
Documents like budget papers, bank guarantees etc., which may be retained for less than 8 years	Doc - 6

4. MODES OF PRESERVATION

- 1) The Documents may be preserved in physical form or electronic form.
- 2) 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, other than disposal of the Documents in accordance with this Policy.
- 3) The preserved Documents must be accessible at all reasonable times. Access shall be controlled by the respective departmental heads of GMM, so as to ensure integrity of the documents and prohibit unauthorized access.
- 4) The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of Documents and efficient utilization of space. This may be done after obtaining prior approval of the respective departmental heads.

5. CUSTODY

Subject to the discretion of the Board, the Documents relating to each and every department shall remain under the custody and overall supervision of their respective departmental heads of GMM, by whatever name called.

6. DISPOSAL OF DOCUMENTS

A Document may be disposed only in the following circumstances:

- a) When it is no longer required to be preserved in accordance with Applicable law; or
- b) Upon the approval of the Board.

The authorized person, in whose custody the Documents are kept, shall maintain a record of all the documents in respect of GMM which have been disposed.

7. PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

- 1) All the persons employed or engaged the Company shall be responsible for taking into account the potential impacts on preservation of the Documents in their work area and their decision to retain/preserve or destroy Documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness tool helping the Company's and Outside legal counsel to track down Documents to handle the legal cases.
- 2) The employees shall be supervised by the head of their respective department(s) who will ensure that the employees identify, classify and archive Documents in accordance with this policy.
- 3) In case of any doubts as to the appropriate classification, the employee shall refer the doubt to the head of his/her respective department. In case of ambiguity as to the classification, the head of the respective department may refer the matter to the Compliance Officer who will determine the classification of the relevant document.

8. PERIODICAL REVIEW OF THE POLICY BY TOP MANAGEMENT

The policy should be flexible and easy to understand and be complied with by personnel employed and engaged by GMM at all levels. The Policy should be reviewed, from time to time and as and when the need for such review may arise, by the KMPs. Provided that, the adoption of the revised policy by GMM shall be subject to its approval by the Board.”

9. ADMINISTRATION

The details of the Documents, along with the respective department of GMM responsible for maintenance and disposal for such Documents, have more particularly been described in Annexure for initial maintenance, retention and disposal schedule for physical and electronic records.

10. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case the Company is served with any notice for request of Documents or any employee becomes aware of a governmental investigation or audit concerning GMM India or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of Documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top Management in such case shall inform all the employee by mail under “User list” of the need to retain the Documents and suspension of disposal of the same.

11. DESTRUCTION OF RECORDS

All information generated in the course of the Company’s business activities that is not required to be retained must be safely destroyed or discarded as soon as practicable.

- The Documents should be destroyed at the end of the preservation period as prescribed in this Policy. The destruction should be carried out in a way that preserves the confidentiality of any information they contain, if so required.
- Records which are required to be maintained for certain period of time, shall be added to the archive when it no longer has a business need.
- Documents should be shredded through a paper shredding machine and not sold as scrap.

12. DISASTER PREPAREDNESS

GMM maintains a business continuity plan (BCP) designed to ensure safety of employee as well as members of the general public, safeguard the Documents and records and to enable a return to normal operating with minimal disruption. Detailed procedures for responding to an incident are part of the BCP.

In the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Company has made appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability. The Company's BCP ensures that the digital collections and technical infrastructure required to manage and access them can be restored in the event of an emergency.

Type of Record

- 1) Accounting and Finance records including Annual Financial statement
- 2) Insurance Records
- 3) Tax records
- 4) Contracts entered into by the Company including Marketing Contracts
- 5) Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities
- 6) Legal Files and Records
- 7) Property Records
- 8) Payroll Records
- 9) Pension and retirement related Records
- 10) Personnel and HR Records
- 11) Programs & Service Records
- 12) Corporate Social Responsibility Records
- 13) Correspondence and Internal Memoranda
- 14) Electronic Documents including email retention and back up
- 15) Miscellaneous Records



1) Accounting and Finance records including Annual Financial statement
Responsibility: FINANCE AND ACCOUNTS DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Accounts Payable ledgers and schedules	8 Years	Doc - 2
Accounts Receivable ledgers and schedules	8 Years	Doc - 2
Annual Audit Reports and Financial Statements, Tax and Vat Audit	Permanent	Doc - 1
Bill of entries	Permanent	Doc - 1

2) Insurance Records

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Annual Loss Summaries	8 Years	Doc - 2
Audits and Adjustments	8 Years	Doc - 2
Claim Files (Including correspondence, medical records, injury documentation, etc.	Permanent	Doc - 1
Group Insurance Plans – Active Employees	8 Years	Doc - 2
Group Insurance Plans – Retirees	Permanent	Doc - 1
Insurance Policies for the Company	Permanent	Doc - 1
Journal Entry Support Data	8 Years	Doc - 2
Releases and Settlements	Permanent	Doc - 1

3) Tax records

Responsibility: FINANCE AND ACCOUNTS DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Tax-Exemption Documents and related correspondence	Permanent	Doc - 1
Excise Tax records	Permanent	Doc - 1
Tax-Exemption Documents and related correspondence	Permanent	Doc - 1
Excise Tax records	Permanent	Doc - 1
Payroll Tax records	8 Years	Doc - 2
Tax Bills, Receipts, Statements	8 Years	Doc - 2
Tax Returns – Income, Franchise, Property	Permanent	Doc - 1
Tax work paper packages – Originals	8 Years	Doc - 2
Sales Tax Records	8 Years	Doc - 2
Annual Information Returns – State and Central	Permanent	Doc - 1
Service Tax Records	8 Years	Doc - 1



4) Contracts entered into by the Company including Marketing Records
Responsibility : MARKETING DEPARTMENT Record Type

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive Documents	5 Years	Doc – 2

5) Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.
Responsibility : LEGAL AND SECRETARIAL DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of board and committees thereof, annual reports originals, etc.)	Permanent	Doc – 1
License and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent	Doc – 1
MCA Filings and Stock Exchange - lings in physical and Electronic form	5 years from date of filing	Doc - 6
Material disclosures hosted on the website of the Company	Permanent	Doc – 1

6) Legal Files and Records
Responsibility : LEGAL AND FINANCE DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Legal Memoranda and Opinions	3 years after the closure of the matter	Doc – 4
Litigation files	1 year after expiration of disposal of the case	Doc – 4
Court Orders	Permanent	Doc – 1
All correspondences exchanged with government authorities/ regulators such as SEBI, RBI and MCA	Permanent	Doc – 1

7) Property Records

Responsibility: LEGAL AND FINANCE DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent	Doc – 1
Original Purchase / Sale Deeds	Permanent	Doc – 1
Original Lease Agreements	3 years after expiration of the lease	Doc – 6

8) Payroll Records

Responsibility: HUMAN RESOURCES DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Employee Deduction Authorization	3 years after termination of service of employment	Doc- 6
Payroll Deductions	3 years after Doc – 6 termination of service of employment	Doc- 6
Labour Distribution Cost Records including details regarding gratuity and retiral disbursements	3 years after termination of service of employment	Doc- 6
Payroll Registers (Gross and Net)	3 years after termination of service of employment	Doc- 6
Time Cards / Sheets	2 years	Doc- 6
Unclaimed Wage Records	3 years	Doc- 6
Leave Records	2 years after the relevant period	Doc- 6

9) Pension and retirement related Records

Responsibility : HUMAN RESOURCES DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Retirement and Pension Records	Permanent	Doc- 1

10) Personnel and HR Records

Responsibility: HUMAN RESOURCES DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Personnel Files of individual employees	Permanent	Doc- 1
Commission / Bonuses / Incentives / Awards	8 years	Doc – 2
Employee Earnings Records	3 years after termination of service of employment	Doc – 6
ESOPs (including details of granting, vesting and exercise of options)	Permanent	Doc- 1
Employee Handbook & Induction Manual	Permanent	Doc- 1
Employee Medical Records	3 years after termination of service of employment	Doc – 6
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers	3 years after termination of service of employment	Doc – 6
Employment Contracts – Individual	3 years after termination of service of employment	Doc – 6
Correspondence with Employment Agencies and Advertisements for job openings	3 years	Doc – 6
Job Description	3 years after superseding the earlier document	Doc - 6

11) Programs & Service Records

Responsibility: HUMAN RESOURCES DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Attendance Records	3 years	Doc – 6
Program statistics, etc.	3 years	Doc – 6
Research & Publications	Permanent	Doc- 1

12) Corporate Social Responsibility Records
Responsibility: FINANCE AND ACCOUNTS DEPARTMENT Record

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Records on CSR Projects(including amount Permanent Doc – 1 budgeted, spent and balance if any) projects undertaken and progress thereon	Permanent	Doc- 1

13) Correspondence and Internal Memoranda
Responsibility: RESPECTIVE DEPARTMENT

General Principle : Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract documents are retained.

1. Those correspondence pertaining to routine matters and having no significant, lasting consequences should be discarded within two years.
2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently

14) Electronic Documents including email retention and back up
Responsibility : INFORMATION TECHNOLOGY DEPARTMENT

1. Electronic Mail : Not all email needs to be retained, depending on the subject matters
 - ✓ All business and work related e-mails – from internal and external sources to be maintained for a period 8 years.
 - ✓ Employee will strive to keep all but an insignificant minority of their email related to business issues
 - ✓ I.T. team would archive emails in line with the policy of Microsoft Office 365 or such other service provider, from time to time, as under:
 - ✓

Year	Retention Period	Rationale
1 Year Archive Policy	365 Days	Based on O365 Policy
2 Year Archive Policy	730 Days	

- ✓ Employee will take care not to send confidential / proprietary information to outside sources
 - ✓ Any e-mail which is beyond 8 years old but is vital to the performance of their job should be copied to the Employee specific folder and/or printed and stored in the Employee's workplace.
- Document Type : Doc 5

2. Electronic Documents including PDF files

- ✓ All Electronic Documents including PDF files to be maintained for a period of 8 years.

Document Type : Doc – 3

3. Web page files

- ✓ May be retained for a period of 5 years as specified in Listing Regulations.
- ✓ May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page.

15) Miscellaneous Records

Responsibility: RESPECTIVE DEPARTMENT

RECORD TYPE	RETENTION PERIOD	DOCUMENT TYPE
Consultant Reports	3 years	Doc – 6
Policy and procedures manuals	Current with history version revision	Doc – 6
Dealership agreements	Current with history version revision	Doc- 6
Annual Reports	Permanent	Doc- 1
Export Documentation – FIRC details	Permanent	Doc- 1
Import Documentation	Permanent	Doc- 1

Document Control

All changes to the process document can be made only by the Document Owner.

Document Owner	Board of Directors of GMM Pfaudler Ltd.
Current Version:	3.0
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Revision History		
Version	Revision Date	Revision Description
1	December 28, 2015	Adopted
2	February 3, 2022	1 st Amendment
3	November 3, 2022	2 nd Amendment