



G.K. CONSULTANTS LIMITED

ARCHIVAL POLICY

1. PREAMBLE

Securities and Exchange Board of India has notified Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. These regulations require every listed Company to disclose on its website all such events or information which has been disclosed to the Stock Exchange(s) and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

2. SCOPE

This policy shall govern the disclosure and archival of such contents only which have been disclosed on the website of the Company pursuant to the compliance with the above mentioned Regulations and which are disclosed with stock exchanges. Other contents displayed / hosted on the website shall be out of purview of the Policy and can be archived / deleted as per the requirement of the content.

3. OBJECTIVES OF THE POLICY

The main objective of this policy is to ensure that all the documents, disclosures made to the stock exchanges pursuant to the Regulations are hosted on the website.

The major objectives of the policy are:

- Identification of Information, documents, events, etc. which are required to be disclosed on the website of the Company.
- Ensuring that all the information is disclosed at the relevant link and there is unanimity in the same every time.
- Ensure that all the information, documents, events disclosed on the website of the Company, unless otherwise specified in the Act, shall remain on the website for the five years from the date of disclosure.
- Documents which are required to be hosted on the website for a particular period, shall be deleted after the due date.

4. DEFINITIONS:

- a) **"Act"** means the Companies Act, 2013, Rules framed there under and any amendments thereto;
- b) **"Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;
- c) **"Company"**, "This Company", "The Company", "Company" wherever occur in the policy shall mean "G K Consultants Limited or GKCL".
- d) **"Board of Directors"** or **"Board"**, means the collective body of the Directors of the company;
- e) **"Policy"** or **"This Policy"** means, " Archival Policy."
- f) **"Website"** means website of the Company i.e. www.gkconsultantsltd.com.

5. INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, Listing Agreement and/or any other SEBI Regulation(s) as amended from time to time.

6. GUIDELINES

The Company being listed on The Bombay Stock Exchange, regularly sends various information, financial statements, notices and other disclosures, as required under listing agreement to Stock Exchanges where securities of the Company are listed. As required under the Act and the Listing agreement the same are also displayed and hosted on the website of the Company.

Regulation 46 read with Regulation 62 of Regulations requires the listed Companies to maintain a functional website containing basic information about the Company and other prescribed details.

Regulation 30(8) requires the Listed Companies to disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.

7. POLICY:

The documents, information, disclosures, notices, policies as provided under the Regulations and the Act, which are required to be disclosed on the website, shall be uploaded on the website of the Company. The website of the Company shall be reviewed on regular intervals for ensuring that all the above-mentioned disclosures are available on the website of the Company as required.

Detailed list of information to be uploaded and updated on website of the Company is enclosed as Annexure forming part of this policy.

8. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

9. DISCLOSURES

The updated policy shall be continuously hosted on the website of the Company.

ANNEXURE

A) THE FOLLOWING INFORMATION SHALL BE UPLOADED ON THE WEBSITE AND SHALL BE UPDATED WITHIN TWO WORKING DAYS FROM THE DATE OF OCCURANCE OF CHANGE

1. Details of Company business;
2. Terms and conditions of appointment of Independent Directors;
3. Composition of various committees of Board of Directors;
4. Code of conduct of Board of Directors and Senior Management Personnel;
5. Details of establishment of Vigil Mechanism/ Whistle Blower policy;
6. Criteria of making payments to non-executive directors, if the same has not been disclosed in annual report;
7. Policy on dealing with related party transactions;
8. Policy for determining 'material' subsidiaries;
9. Details of familiarization programmes imparted to Independent Directors;
10. Email address for grievance redressal and other relevant details;
11. Contact information of the designated officials who are responsible for assisting and handling investor grievances;
12. Financial information including:
 - a) notice of meeting of the board of directors where financial results shall be discussed;
 - b) financial results, on conclusion of the meeting of the Board of Directors where the financial results were approved
 - c) Complete copy of the annual report including balance sheet, profit and loss account, director's report, corporate governance report etc.
13. Shareholding pattern;

14. Details of agreements entered into with the media companies and/or their associates, etc.;
15. Schedule of analysts or institutional investors meet and presentations made by the listed entity to analysts or institutional investors;
Explanation: For the purpose of this clause ‘meet’ shall mean group meetings or group conference calls conducted physically or through digital means;]
16. Audio or video recordings and transcripts of post earnings/quarterly calls, by whatever name called, conducted physically or through digital means, simultaneously with submission to the recognized stock exchange(s), in the following manner:
 - a) the presentation and the audio/video recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of such calls, whichever is earlier;
 - b) the transcripts of such calls shall be made available on the website within five working days of the conclusion of such calls:
Provided that-
 - The information under sub-clause (i) shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.
 - The information under sub-clause (ii) shall be hosted on the website of the listed entity and preserved in accordance with clause (a) of regulation 9.

The requirement for disclosure(s) of audio/video recordings and transcript shall be voluntary with effect from April 01, 2021 and mandatory with effect from April 01, 2022;]
17. New name and the old name of the Company, for a continuous period of one year, from the date of the last name change, if applicable;
18. items in sub-regulation (1) of regulation 47;
19. With effect from October 1, 2018, all credit ratings obtained by the entity for all its outstanding instruments, updated immediately as and when there is any revision in any of the ratings;

20. separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year, uploaded at least 21 days prior to the date of the annual general meeting which has been called to inter alia consider accounts of that financial year]:

Provided that a listed entity, which has a subsidiary incorporated outside India-

- a) where such subsidiary is statutorily required to prepare consolidated financial statement under any law of the country of its incorporation, the requirement of this proviso shall be met if consolidated financial statement of such subsidiary is placed on the website of the listed entity;
 - b) where such subsidiary is not required to get its financial statement audited under any law of the country of its incorporation and which does not get such financial statement audited, the holding Indian listed entity may place such unaudited financial statement on its website and where such financial statement is in a language other than English, a translated copy of the financial statement in English shall also be placed on the website;
21. secretarial compliance report as per sub-regulation (2) of regulation 24A of these regulations;
22. disclosure of the policy for determination of materiality of events or information required under clause (ii), sub-regulation (4) of regulation 30 of these regulations;
23. disclosure of contact details of key managerial personnel who are authorized for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s) as required under sub-regulation (5) of regulation 30 of these regulations;
24. disclosures under sub-regulation (8) of regulation 30 of these regulations;
25. statements of deviation(s) or variation(s) as specified in regulation 32 of these regulations;
26. dividend distribution policy by listed entities based on market capitalization as specified in sub-regulation (1) of regulation 43A;
27. annual return as provided under section 92 of the Companies Act, 2013 and the rules made thereunder.]