

**GCM COMMODITY & DERIVATIVES LTD**

**Policy on Preservation of Documents**

**1. BACKGROUND:**

The Securities and Exchange Board of India has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) on September 2, 2015 to be effective from December 1, 2015.

Regulation 9 of these Listing Regulations deals with preservation of documents divided in two categories:

- a). Documents whose preservation shall be permanent in nature.
- b). Documents with preservation period of not less than 8 years.

**2. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:**

- i) Certificate of Incorporation
- ii) Certificate of Commencement of Business
- iii) Memorandum & Articles of Association
- iv) License, Certificate, Registration Documents obtained from various Statutory Bodies in India
- v) Numbers allotted by various Statutory Bodies
- vi) Minutes of Meeting of Board & its Committees
- vii) Minutes of the Meeting of Shareholders
- viii) Statutory Registers required under the provisions of Companies Act 1956 & 2013
- ix) Documents filed with Bombay Stock Exchange
- x) Documents uploaded on the website of the Company
- xi) All the Documents and Return, Forms etc filed with the Registrar of Companies
- xii) All kinds of Court Orders

**3. DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN 8 YEARS.**

- i) Books of Accounts
- ii) Accounting and Corporate Tax records
- iii) Bank Records
- iv) Employment, Employee & Payroll records
- v) Marketing & Sales documents
- vi) Insurance related documents

This policy can be amended by the Board and the amended policy shall prevail thereafter.