

POLICY ON DOCUMENT PRESERVATION & ARCHIVAL OF DOCUMENTS:

Background

Gateway Distriparks Limited (GDL) is a Container Logistics company. It operates Container Freight Stations to service the EXIM trade at ports. GDL has formalized this Policy on Document Preservation & Archival of Documents ("**Policy**") to identify, classify and preserve the documents, according to the nature of the documents.

Statutory Mandate & Objective

The policy on document preservation and archival of documents is mandated by the provisions of Chapter III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR"). Pursuant to this Policy, the Company intends to safeguard significant documents and preserve them to ensure durability of documents including documents in electronic form. This Policy may be reviewed by the Board of Directors and amendments be made, to comply with any requirements under any statute or regulation, from time to time.

Process:

A) Permanent Preservation:

- 1) All documents filed with Ministry of Corporate Affairs.
- 2) All documents filed with SEBI / BSE / NSE.
- 3) All documents filed with Tax Authorities in connection with Income Tax, Service Tax, VAT & similar tax authorities.
- 4) All permits, licenses, authorization from any statutory authorities.
- 5) Audited Accounts of GDL
- 6) Documents relating to investments made by GDL in subsidiaries.
- 7) Any other document required to be preserved permanently under any applicable Indian law / statute.

B) Preservation for 8 years after completion of the relevant transactions:

- 1) Bank, cash vouchers, payment vouchers, warrants
- 2) Bank statements
- 3) Purchase bills
- 4) Sales invoices, Debit / credit notes, etc.
- 5) Accounting records
- 6) Any documents related to correspondence with Customs Authorities at Inland Container Depots or Container Freight Stations
- 7) Any other documents required to be preserved for 8 years under any applicable Indian law /statute.

- C)** Other documents maybe stored and preserved in physical form/ electronic form, after the completion of the relevant transactions, for such period as may be required, in each case.

Electronic Documents including email retention and back up

Electronic Mail:

- 1) All e-mail – from internal and external sources to be deleted after they cease to be of relevant / required for current use.
- 2) Employees should keep emails related to current business issues.
- 3) I.T Department would archive email for 7 years on email archival server after the employees have deleted it, post which time the email will be permanently deleted.
- 4) Employee will not store or transfer the Company related emails on non-work related / official computers except as necessary or appropriate with due approvals from the respective Head of Department.
- 5) Employees will be prohibited and will need to ensure not to send confidential information to outsiders.

Web page files

- 1) All such events / information hosted on the Company's website shall be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
- 2) After the initial period of 5 years, documents / information (except documents of permanent nature as per Paragraph A above) shall be archived by the I.T. department for a further period of 3 years.
- 3) Documents of permanent nature (as per Paragraph A above), uploaded on the Company's website, shall be archived by the I.T. Department.

Responsibility:

The responsibility for preservation of the documents will be on the concerned department heads. Head – IT will be responsible for all the documents preserved in electronic mode.