

# UNITED POLYFAB GUJARAT LIMITED

## POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

*{Pursuant to SEBI (Listing Obligations and Disclosure Requirements),  
2015}*

## 1. PREFACE

**UNITED POLYFAB GUJARAT LIMITED** (“UPGL” or “Company”), being a listed entity, is obligated to frame a policy for preservation of documents in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI-LODR). As per Regulation 9, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode.

In accordance with the above Regulation 9, the Company has framed a Policy for Preservation of Documents (hereinafter the “Policy”). The Policy is framed in line with the existing provisions of SEBI –LODR, 2015. Any future changes in the SEBI -LODR will, ipso facto, apply to this Policy.

## 2. DOCUMENTS TO BE PRESERVED

The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made.

For determining the preservation period, the records are categorized into following three categories:

| <b>Category &amp; Description</b>  | <b>Period of Preservation</b>                            |
|--|--|
| Records/documents with short reference value – i.e. Records, which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc.  | Less than 8 years  |
| Records/documents required to be maintained as per statutory requirements and having higher reference value – i.e. records having contractual/legal implications, which need to be preserved for a prescribed periods as per statutory requirement; and records, which need to be, preserved for a particular period according to Company’s own reference needs. | Documents to be preserved for a period of 8 to 12 years. |
| Records which will have a permanent value for the Company even after the expiry of legal preservation period.  | Permanent  |
| Records which are required for adducing evidence in judicial or quasi judicial or other dispute redressal forum  | Till the time the matters are finally disposed of.       |

Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or

against the Company, suits pending in courts, tribunals, quasi judicial forum and other mediation and alternate dispute forum, industrial disputes, etc. are preserved according to specific needs and even beyond the prescribed period. Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government/ Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

### **3. PRESERVATION LOCATION**

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department.

### **4. POLICY REVIEW**

In case of any amendment (s), clarification (s), circular (s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions in this Policy and this Policy shall stand amended accordingly. The Board has the power to replace this Policy entirely with a new policy.

## ARCHIVAL OF DOCUMENTS

### 1. PREFACE

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”). The Regulations mandate listed entities to formulate an archival policy. It is in this context that the policy on archival of Documents (“Policy”) is being framed and implemented.

### 2. OBJECTIVE

The Objective of this policy is to comply with Regulation 30(8) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 as mentioned below:

“The Listed Entity shall disclose on its website all such events and information which has been disclosed to stock exchange(s) under this regulation, 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.”

### 3. ARCHIVAL POLICY

In accordance with the provisions of the aforesaid regulation, the company shall ensure that all the information shall be hosted on the Company’s website ([www.upgl.in](http://www.upgl.in)) for a period of 5 years and thereafter will be archived for a period of 1 year.

### 4. DOCUMENTS TO BE MADE AVAILABLE ON THE WEBSITE OF THE COMPANY

(A) The Company is to maintain a functional website containing:-

- the basic information about the Company,
- all Information and/or documents as specified in the applicable provisions of Companies Act, 2013,
- all Information and/or documents as specified in Regulation 46 (2) of the Listing Regulations,
- all Information and/or documents as mentioned in Regulation 30 of the Listing Regulations on Material Events,
- all other Information and/or documents as required under Listing Regulations,

(B) The Company shall ensure that contents of the website are correct.

(C) The Company shall update any change in the content of its website within two working days from the date of such change in content.

- (D) Information and/or Documents that need to be made available under Regulation 30 of the Listing Regulations shall be made available on the website simultaneously with disclosure to Stock Exchanges.
  
- (E) The information and/or documents uploaded on the website shall be available for current financial year and for the preceding five financial years.