

**INDO GULF INDUSTRIES LIMITED**

**ARCHIVAL POLICY**

### **Clause 1- Policy Statement**

The Company is committed to establish and maintain information that meets its business needs, accountability requirements and stakeholder expectations.

Through this Archival Policy, on one hand the Company aims to build a framework for ensuring dissemination of relevant, sufficient and reliable information on a timely and regular basis and to deal with the information that have presently lost its relevance, on the other.

The Policy aims at nourishing the transparency, accountability and relationship with stakeholders.

### **Clause 2- Definitions**

**Archive:** A collection of historical documents or records providing information accumulated over the course of an organization's lifetime. It can also be termed as 'Corporate Memory'.

**Archives:** It is referred to a repository where the records are kept.

**Archivists:** Archivists is a person who on a time to time basis reviews the requirement of hosting information on the web portal of the Company. The Compliance Officer and Whole Time Director of the Company shall act as Archivists.

**Electronic records:** Records communicated and maintained by means of electronic equipment.

**Records:** A "record" is a database of disclosed information or events in any format or medium that has been created by or for the Company, or received by the Company in connection with the transaction of the organization's affairs and operations.

### **Clause 3- Rationale of the Policy**

This Policy emphasizes on the importance of preservation of the records and disclosures hosted on the website of the Company for making information accessible to the general public for taking well-informed decisions. Both electronic and paper documents that are needed to be disclosed are generally backend by some regulatory requirement and are thus, subject to be handled with due care. Therefore, electronic records must be managed as a part of a comprehensive record keeping program. The Policy has been framed with an objective of maintenance of the Company's historical data and records hosted on the

website at one place, in known locations for making it accessible to staff, shareholders of the Company and its prospective investors.

#### **Clause 4- Objective of the Policy**

Since the disposition phase of the records is critically important from the perspective of legal and economical maintenance of records, therefore, it becomes imperative to retain those records having long term value to the Archives for permanent storage and to suitably deal with the records having relevance for a specific period of time. Through this Policy, the Company seeks to preserve and manage the records in a consistent and logical manner to achieve the below mentioned objectives:

- to meet the legal standards for protection, storage, and retrieval of the record;
- to use the space on the website efficiently; and
- to minimize the cost of record retention.

#### **Clause 5- Scope of the Policy**

The Company's all information and disclosures which have been made to stock exchange(s) under listing regulation shall remain in public domain at the Archives section on the website of the Company or the same shall be available at the Archival link at <http://www.indogulfind.com/> after stipulated period of 5 years, from the time when the said information and disclosures are being hosted on the Company's website. The records stored in the Archives may be in any format or medium. Any kind of information which is of significant and enduring value as per the management of the Company shall be made available in the Archive component.

The Board of Directors, Compliance Officer and staff of the Company shall be familiar with this Policy.

#### **Clause 6- Record Appraisal**

Determining the value of a record series is known as "appraisal". Appraisal is the process by which archivists determine the administrative, legal, and fiscal value as well as the historical and long-term research value of records. Once the value of a record series has been determined, a realistic retention period can be assigned to it. Appraisal can take place at any point during a record series' life cycle, but is most frequently done when the records become inactive.

### **Clause 7- Appraisal Consideration**

Some of the considerations taken into account during the appraisal process include:

- administrative and operational need served by the record;
- legal and fiscal regulations governing retention;
- historical significance;
- economic advantage of moving the records from high cost office storage to low cost records storage space or direct disposal;
- Identification of materiality of records after a stipulated time period and its impact thereon.

### **Clause 8- Scope of Records**

*In General*, as per this Archive Policy, every kind of information that is material for the business affairs of the Company or that is mandated to be disclosed on the website as per the provisions of applicable statutes, rules and regulation, shall be hosted on the website of the Company for the ***minimum period of 5 years from the date of occurrence/ happening of an event or transaction as the case may be***. Thereafter, in the interest of stakeholders at large and on the basis of appraisal process, the Compliance Officer or Whole time Director may opt any of the following strategies:

- (a) extend the time period of hosting of the information on the Company's Website; or
- (b) dispose of the information if it is of no relevance; or
- (c) get it stored in the Archives section for future reference, if it is not relevant to host but have long-term retention value.

### **Clause 9- Compliance Officer:**

The Company Secretary shall be the Compliance Officer of the Company and in his/her absence Whole Time Director of the Company shall act compliance officer of the company.

### **Clause 10- Authority & Responsibility:**

It shall be the responsibility of the Compliance Officer or whole time director, as designated by the Board of Directors of the Company, to keep on updating the Archive section on the website from time to time, by placing the records therein. The authority for determining the time within which the records will be

moved to the Archive section shall be decided by the Compliance officer or whole time director and reported to the Board of Directors of the Company. The records shall be moved to the Archives only after the approval of the Compliance officer.

**Clause 11- Effective date and Policy Enforcement**

The Policy shall be effective from 1<sup>st</sup> day of December, 2015.

**Clause 12- Amendment to the Policy**

The Board of Director shall alter, amend or modify the clauses of the policy from time to time in line with requirement of SEBI Guidelines or any other rules, regulations etc., which may be amend from time to time.