GUJARAT VICTORY FORGINGS LIMITED

POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

[ADOPTED BY BOARD ON 12TH MARCH, 2026]

DESCRIPTION OF DOCUMENT: *This document provides a brief description of the Policy on Preservation and Archival Of Documents at Gujarat Victory Forgings Limited.*

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GUJARAT VICTORY FORGINGS LIMITED

(Formerly Known as Gujarat Victory Forgings Private Limited)

CIN: U27201GJ1990PLC014433

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POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

The following is the Policy on Preservation and Archival of Documents adopted by Gujarat Victory Forgings Limited (hereinafter referred to as the "**Company**") in accordance with the provisions of the Companies Act, 2013 **("Act")** and Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**").

1. INTRODUCTION

In terms of Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, every listed Company is required 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.

Accordingly, the Company has framed this policy.

2. OBJECTIVE

The purpose of this document is to formulate a policy for preservation and archiving of documents in accordance with the provisions of the Act read with Rules made there under and the Regulations, to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the applicable statutory requirements.

3. SCOPE

All documents covered under this policy shall be preserved as per the periodicity stated in the annexure to the policy. All other documents of the Company shall be maintained in compliance with the requirements of the applicable laws.

4. TERMS AND REFERENCES

4.1. **Board** means Board of Directors of the Company as constituted from time to time.

4.2. **Document (s)** includes all papers, records, files, books, etc., as required to be maintained under the Act and the Regulations.

4.3. **Electronic form** includes any electronic device such as computer, laptop, tab, compact disc, floppy disc, cloud space, server or any other form of storage or retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

5. CLASSIFICATION OF DOCUMENTS

5.1. The documents of a permanent nature (listed in **Annexure – 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents

shall also be preserved permanently by the Company.

5.2. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure – 2)** shall be preserved by the Company for a term of not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term of not less than eight years.

Provided further that the Company may keep the documents as specified above in electronic mode.

6. MODES OF PRESERVATION

6.1. The Documents may be preserved in physical form or electronic form.

6.2. The officer of the Company required to preserve the Document shall be an authorised person who is generally expected to observe the compliance of requirements of applicable law.

6.3. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

6.4. The preserved Documents must be accessible at all reasonable times. Access may be controlled by authorised person with preservation, so as to ensure integrity of the Documents and prohibit unauthorised access.

7. AUTHORITY AND RESPONSIBILITY

7.1. The functional head of the concerned department shall be responsible for maintaining and destroying the records according to the time frame prescribed in the Policy.

7.2. Each of the departments is responsible for keeping track of the location and contents of all documents for which they are responsible.

8. DOCUMENTS TO BE MADE AVAILABLE ON THE WEBSITE OF THE COMPANY

8.1. As required under the Listing Regulations, the Company shall maintain a functional website containing:

(i) The basic information about the Company;

(ii) All Information and / or documents as specified in Regulation 46(2) of the Listing Regulations;

(iii) All Information and / or documents as mentioned in Regulation 30 of the Listing Regulations on Material Events;

(iv) All Information and / or documents as specified in the applicable provisions of the Act and Listing Regulations.

8.2. The Company shall ensure that the contents of the website are correct.

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

8.4. The information and/or documents uploaded on the website shall be available for the current financial year and for the preceding five financial years.

9. ARCHIVAL PROCEDURE

9.1. All disclosures / filings made to stock exchanges pursuant to the Regulations shall be hosted on the website for a minimum period of five years and thereafter the documents shall be archived and stored under the archival folder for a further period of 2 years.

9.2. Documents shall be moved / transferred to archival folder under the respective heads / sub-folders in a way so that these documents can be searched easily as and when required by any person.

10. DESTRUCTION OF DOCUMENTS

10.1. After the expiry of the statutory retention period, the preserved Documents may be destroyed in such mode under any instructions recommended by the department head(s) and approved by the Board.

10.2. The details of Documents destroyed by the Company shall be recorded in the Register of Disposal of Records to be kept by department head(s) who are disposing of the documents in the format prescribed at **Annexure-3**.

10.3. This applies to both physical and electronic Documents.

11. INTERPRETATION

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this policy and procedures until such time as this policy is changed to conform to the law, rule, regulation or standard.

12. REVIEW AND AMENDMENTS

The Board (including its duly constituted Committees) may, from time to time, make amendments to this Policy to the extent required due to changes in applicable laws and Listing Regulations or as deemed fit in a review. The modifications, if any, made to the policy shall be disclosed on the website of the Company.

(This Policy is approved and adopted by the Board of Directors of the Company in its meeting held on 12th March, 2026)

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ANNEXURE – 1

INDICATIVE LIST – DOCUMENTS FOR PERMANENT PRESERVATION

1. Documents and information filed with the Registrar of Companies for Incorporation of the Company
2. Certificate of incorporation, Certificate of commencement of business, Certificate of change of name, if any
3. Common Seal of the Company, if any
4. Memorandum and Articles of Association as amended from time to time
5. Minutes Books of General Meetings, Board Meetings and Committee Meetings
6. Statutory Registers except those Registers listed in Annexure – 2
7. All books and documents relating to the issue of share certificates, including the blank forms of share certificates
8. Agreements made by the Company with the Stock Exchanges and Depositories, etc.
9. Statutory forms except for routine compliance
10. Licenses, Certificate and permissions obtained from any statutory authority
11. Order from Courts and any other regulatory authorities, intellectual property documents
12. Policies of the Company framed under the Companies Act, 2013 and various regulations from time to time
13. Files relating to premises for instance Title Deeds / Lease Deeds of owned premises / land and building, etc. and related Ledger/ Register
14. Any other document as may be required to be maintained permanently in terms of the Act and Regulations, maintained and preserved from time to time.

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ANNEXURE – 2

INDICATIVE LIST – DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN 8 YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION

1. Annual Returns and copies of all certificates and documents required to be annexed thereto
2. Attendance Register of Board, General and Committee meetings
3. Income-Tax Papers
4. Scrutiniser's report and related documents
5. Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers
6. Statutory disclosures
7. Books of accounts including vouchers relevant to any entry in such books of accounts and Financial statements
8. Disclosures of interest by Directors
9. Instrument creating a charge or modification
10. Register of debenture-holders including index of debenture-holders (from the date of redemption of debentures)
11. Foreign register of debenture-holders (from the date of redemption of debentures)
12. Register of Deposits
13. Employee information records
14. Structured Digital Database as per SEBI (Prohibition of Insider Trading) Regulations, 2015 after completion of the relevant transactions and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

Any other document as may be required to be maintained in terms of the Act and Regulations, maintained and preserved from time to time.

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ANNEXURE – 3

SPECIMEN FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED OF / DESTROYED

Particulars of Document	Date of Destruction	Date of Board Approval	Initials of the Authorised Person

Registered Office: B. No. 1147, Old RS No. 1558, Village Manjusar, Lamdapura, Vadodara, Savli – 391775, Gujarat
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Annual Return, Auditors Report including Balance Sheet, Board Report			
1991-1992	10.02.2014	19.02.2014	
1992-1993	10.02.2014	19.02.2014	
1993-1994	10.02.2014	19.02.2014	
1994-1995	10.02.2014	19.02.2014	
1995-1996	10.02.2014	19.02.2014	
Board Report, Annual Return & Form 66			
1996-1997	10.02.2014	19.02.2014	
1998-1999	10.02.2014	19.02.2014	
1999-2000	10.02.2014	19.02.2014	
2000-2001	10.02.2014	19.02.2014	
2001-2002	10.02.2014	19.02.2014	
Board Report			
2002-2003	10.02.2014	19.02.2014	
2003-2004	10.02.2014	19.02.2014	
Form 24AA			
1991-1992	10.02.2014	19.02.2014	
1992-1993	10.02.2014	19.02.2014	
1993-1994	10.02.2014	19.02.2014	
1994-1995	10.02.2014	19.02.2014	

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1995-1996	10.02.2014	19.02.2014	
1996-1997	10.02.2014	19.02.2014	
1998-1999	10.02.2014	19.02.2014	
1999-2000	10.02.2014	19.02.2014	
2000-2001	10.02.2014	19.02.2014	
2001-2002	10.02.2014	19.02.2014	
2002-2003	10.02.2014	19.02.2014	
2003-2004	10.02.2014	19.02.2014	
2004-2005	10.02.2014	19.02.2014	
Form 24 AA required under section 299 and 274 of Companies Act 1956 for F.Y			
2005-2006	10.06.2022	19.02.2014	
2006-2007	10.06.2022	19.02.2014	
2007-2008	10.06.2022	19.02.2014	
2008-2009	10.06.2022	19.02.2014	
2009-2010	10.06.2022	19.02.2014	
2010-2011	10.06.2022	19.02.2014	
2011-2012	10.06.2022	19.02.2014	
2012-2013	10.06.2022	19.02.2014	
2013-2014	10.06.2022	19.02.2014	

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The attendance register of Board & Committee Meetings (from F.Y 1991-1992 to 2013 - 2014)	10.06.2022	19.02.2014	
Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the company (FY 1991-92 to FY 2013-14)	10.06.2022	19.02.2014	
Office copies of general meeting Notices, scrutinizers report and other related papers of the company (FY 1991-92 to FY 2013-14).	10.06.2022	19.02.2014	

For and on behalf of Board
Gujarat Victory Forgings Limited
(Formerly Known as Gujarat Victory Forgings Private Limited)



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Rahul Vijendra Agrawal
Chairman & Managing Director
DIN: 02523976