

DOCUMENT PRESERVATION POLICY

(Effective December 1, 2015)

1. LEGAL FRAMEWORK

Securities and Exchange Board of India by Notification dated September 2, 2015 introduced Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulation, 2015. It shall come into force on the ninetieth day i.e. December 01, 2015 from the date of their publication in the Official Gazette.

Pursuant to Regulation 9 of aforesaid Regulation, every listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

- (a) Documents whose preservation shall be permanent ;
- (b) Documents with preservation period of not less than eight years after completion of the relevant transaction.

2. DOCUMENT PRESERVATION POLICY

A document preservation policy (DPP) provides for the systematic review, retention, and destruction of documents received or created in the course of business. A DPP will identify documents that need to be maintained, contain guidelines for how long certain documents should be kept, and save the company's valuable computer and physical storage space. In addition, a well crafted DPP that is followed by the employees of the Company may assist the company in the event of litigation.

The corporate records of Gitanjali Gems Limited (hereafter referred as the "Company") are important assets. Corporate records include essentially all records one produces as an employee, whether paper or electronic. A record may be as obvious as a memorandum, trademark, patent, copyright, a contract etc. or something not as obvious, such as a computerized desk calendar, an appointment book or an expense record etc.

3. DEFINITION

Regulations mean SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015.

Document Preservation Policy (DPP) " means policy required under Regulation 9 of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015" duly approved by the Board of Directors of the Company.

Corporate Records means "all records maintained by the Company in physical or electronic mode".

4. POLICY STATEMENT

To facilitate efficient and effective operation of the company, all business records should be kept no longer than the period necessary for the proper conduct of Company's Business. This policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records, including e-mail messages in personal folders.

The documents mentioned in Annexure I are the documents whose preservation shall be permanent. Rest all documents and records shall be maintained for a minimum period of eight (8) years from the date generated. No records which are not permanent in nature shall be destroyed unless destruction thereof is sanctioned by the Board of Directors of the company.

Annexure-1

1. Memorandum and Article of Association of the company
2. Register and Index of members of the company
3. Minutes of the meeting of the Board of Directors and Committees
4. Minutes of the meeting of the members of the company
5. Register of Charge
6. Register of renewed and duplicate share certificate
7. Register of contract and arrangement in which the Directors are interested
8. Blank share certificate and related books and documents thereto
9. Register of loans and investments
10. Such other records and documents as may be specified by the Board of Directors from time to time.