



**GAJA ALTERNATIVE ASSET MANAGEMENT LIMITED
(Formerly known as GAJA ALTERNATIVE ASSET
MANAGEMENT PRIVATE LIMITED)**

WEBSITE ARCHIVAL POLICY

Background:

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 come into force from December 1, 2015. 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.

Objective of the Policy:

The objective of this Policy is to determine the period for maintenance, preservation and disposal of physical and electronic Documents and Records of the Company. Pursuant to the Regulation 30 of the Listing Regulations, the listed company shall disclose on its website all such events or information which has been disclosed to stock exchange(s), and such disclosures shall be hosted and retained on the website of the Company for a minimum period of 5 (five) years from the date of its publication (“Mandatory Hosting Period”) and thereafter, as per this Policy.

This Policy defines the time period for which the disclosed information shall be archived beyond the Mandatory Hosting Period considering the requirements of various statutes, law, regulations etc. and other legal and administrative aspects (“the Archival Period”).

Archival

- The information on Material Events shall be displayed on the website of the Company for Mandatory Hosting Period. The aforesaid information which is more than 5 (five) years old will be archived from the website of the Company and shall be maintained by the Company for a further Archival period of 3 (three) years using appropriate technology. These archives shall be made available on a written request made to the Compliance Officer of the Company.
- Every function/unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy.
- Every function/unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

Review of the Policy:

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant regulation and remains effective. The Board of Directors has the right to alter, modify, add, delete or amend any of the provisions of this Policy at its discretion and the new policy shall be displayed to the stakeholders.