



POLICY ON PRESERVATION OF DOCUMENTS

GALLANT SPORTS & INFRA LIMITED

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(Formerly known as Gallant Sports & Infra Private Limited)

CIN: U92400HR2016PLC063698

Reg. Off. Unit 424, 4th Floor, Eros City Square, Rosewood City, Sector 49, Gurgaon 122018, Haryana
Tel: +91 98112 29407 / +91 95990 06941 | Email: info@gallantsports.in | www.gallantsports.in



1. PREAMBLE

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI Listing Regulations) requires every listed company to formulate a Policy on Preservation of Company Documents which shall be approved by the Board of Directors.

Accordingly, this policy is made and approved by the Board of Directors in its meeting on 3rd April 2026.

2. OBJECTIVE OF THE POLICY

Thus, this policy (“Policy”) is framed with an objective of classifying records, registers, returns etc. in at least two categories as follows-

- (a) documents whose preservation shall be permanent in nature;
 - (b) documents with preservation period of not less than eight years after completion of the relevant transactions
- for the purpose of such maintenance and preservation as prescribed.

3. DEFINITIONS

Unless repugnant to the meaning or context thereof, the following expressions, wherever used in this Code, shall have the meaning assigned to them below:

- i. “**Books of Accounts**” as defined in Section 2(13) of the Act.
- ii. “**Company**” means Gallant Sports & Infra Limited.
- iii. “**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- iv. “**Maintenance**” means keeping documents, either physically or in Electronic Form
- v. “**Policy**” means this Policy on Preservation of Company Documents.
- vi. “**SEBI Listing Regulations**” means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.

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4. PRESERVATION OF DOCUMENTS

The Documents shall be preserved under following two categories:

(i) **PERMANENT NATURE:**

The documents of a **permanent nature** which is given in Annexure 1 shall be maintained and preserved permanently by GALLANT SPORTS & INFRA LIMITED (“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, deletions in the documents shall also be preserved permanently by the Company.

(ii) **SPECIFIED PERIOD**

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions which is given in Annexure 2 which shall be preserved by the Company for the term 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 not less than eight years.

Without prejudice to the foregoing, the Books of Account of the Company shall be maintained and preserved in accordance with the provisions of Section 128 of the Companies Act, 2013 and the rules made thereunder, for a period of not less than eight financial years immediately preceding the current financial year or such longer period as may be required under the Companies Act, 2013 or as may be directed by any statutory authority, court, tribunal or other competent authority. Where the Books of Account are maintained in electronic form, the Company shall ensure that such records remain accessible in India, are capable of being retrieved in a legible form, and are supported by adequate and regular backups. In case such electronic records are maintained using the services of a third-party service provider, the Company shall intimate the Registrar of Companies on an annual basis about the name, address and other details of such service provider, in accordance with the provisions of the Companies Act, 2013 and the rules made thereunder.

The Company shall ensure that all documents preserved under this Policy, whether in physical or electronic form, are maintained in a secure manner with appropriate safeguards to prevent unauthorised access, alteration, destruction or loss. Electronic records shall be subject to adequate backup, access controls and integrity checks, and physical records shall be stored in a secure and controlled environment. Access to such documents shall be restricted to authorised personnel only, in accordance with the roles and responsibilities defined by the Company from time to time.

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In the event the Company is served with any notice for documents from any of the statutory authorities or any litigation is commenced by or against the Company, then the disposal of documents which are subject matter of such notice or litigation shall be suspended until such time the matter is settled, resolved or disposed off. The relevant authorised person shall be responsible for informing all relevant employees of the Company about suspension of further disposal of documents.

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of functions falling under the charge of each of them, in terms of this Policy. They shall also designate an authorised person who shall ensure compliance of this Policy.

5. DESTRUCTION OF DOCUMENTS

The documents specified in Annexure 2 which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and manner as specified and approved by the Functional/ Departmental Heads. This applies to both physical & electronic documents.

6. AMENDMENT TO THE POLICY

The policy would be reviewed on an annual basis by the Board of Directors. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors. However, the amended regulatory requirements will supersede the existing Policy till the time Policy is suitably amended.

For and on behalf of

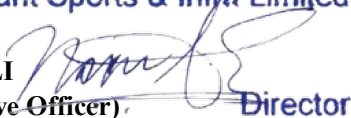
Gallant Sports & Infra Limited

Gallant Sports & Infra Limited

Mr. NASIR ALI

(Chief Executive Officer)

DIN: 02996159

 Director

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**“ANNEXURE – 1”****DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE**

Sr. No.	Documents
1.	Property records including purchase and sale deeds, licences, copyrights, patents & trademarks
2.	Certificate of Incorporation & incorporation related documents
3.	Minutes of Board, Committee and Shareholders' Meetings
4.	Register of Members and other Statutory Records
5.	Register of loans, guarantee, security and acquisition made by the company
6.	Register of contracts with related party and contracts and Bodies etc. in which directors are interested
7.	Personal files of all live employees
8.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

“ANNEXURE – 2”**DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS
AFTER COMPLETION OF RELEVANT TRANSACTION**

Sr. No.	Documents
1.	Books of account including relevant books and papers and financial statements.
2.	Disclosures/ notices by a director of his interest
3.	Instrument creating a charge or modification
	Annual return and copies of all certificates and documents required to be annexed thereto
4.	Registers of Fixed assets
5.	Attendance Register of Board Meetings
6.	Attendance Register of Committee Meetings
7.	Attendance Slips of General Meetings
8.	Register of Deposits
9.	Register of Proxies
8.	Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

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