

ARCHIVAL POLICY

I. PREAMBLE

The Securities and Exchange Board of India ("SEBI") vide its Notification dated September 02, 2015 has issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Regulations"). The said Regulations will become effective from December 01, 2015.

In terms of the above Regulations, Gillanders Arbuthnot and Company Limited ("the Company") is now required to disclose events or information which, in the opinion of the Board of Directors of the Company, is material. Further, the Company shall disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under this Regulation, 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 Company. The Company has adopted the Archival Policy ("the Policy") in terms with Regulation 30 of the Regulations.

II. OBJECTIVE

This Policy provides a framework for ensuring that information relating to the Company is adequately disclosed on its website as required by law, from time to time.

III. DISCLOSURE OF INFORMATION ON WEBSITE

Mr. D. K. Paul and Mr. D. Roy, in-charge of the EDP department of the Company, or such other person who shall be heading the said department, will be responsible for ensuring that all information required to be statutorily disclosed on the Company's website under the Regulations is uploaded on the website of the Company and that the said information is accurate, comprehensive and updated from time to time.

Any change in the content of its website shall be updated within two (2) working days from the date of such change in content.

IV. DISCLOSURE ON THE WEBSITE OF THE COMPANY

This Policy shall be hosted on the website of the Company.

V. COMPANY'S POWERS/ AMENDMENTS

The Company reserves its right to amend, suspend, modify or rescind this Policy in whole or in part, at any time without assigning any reason whatsoever. The Company may also establish further rules and procedures, from time to time, to give effect to the intent of this policy and to promote the objective of good corporate governance.

Date: November 14, 2015.

