

HOTEL POLO TOWERS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

PREAMBLE

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") requires every listed company to formulate a policy on preservation of documents, which has to be approved by the Board of Directors.

Further, Regulation 30(8) of the Listing Regulations requires listed entities to adopt an Archival Policy for website disclosures.

In this context, the following policy has been framed by Hotel Polo Towers Limited ("the Company") with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

SCOPE & OBJECTIVE

In terms of the provisions of Regulation 9 of the Listing Regulations, the Company shall have a policy for Preservation of Documents classifying them in at least two categories as follows:

- i. documents whose preservation shall be permanent in nature;
- ii. documents with preservation period of not less than eight years after completion of the relevant transactions, in accordance with applicable law.

The objective of this Policy is to ensure that all significant documents generated or received by the Company are properly maintained and preserved in accordance with applicable statutory provisions. The Policy further facilitates the appropriate disposal of documents that are no longer required.

DEFINITIONS

"Act" means the Companies Act, 2013, rules framed thereunder and any amendments thereto.

"Applicable Law" includes any statute, law, regulation, rule, judgment, order, decree, guideline, notification and clarification issued by any governmental, regulatory or statutory authority.

"Board" means the Board of Directors of the Company.

"Company" means Hotel Polo Towers Limited.

"Document(s)" refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether otherwise, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

“Electronic Record(s)” means the electronic record as defined under clause (t) of sub-section (1) of Section 2 of Information Technology Act, 2000.

“Electronic Form” means on any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud or any other form of storage and 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.

“Maintenance” means keeping Documents either physically or in electronic form.

“Listing Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended;

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed. Terms not herein defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013 and the Listing Regulations.

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ARCHIVAL OF DOCUMENTS AND INFORMATION

1. The Company shall preserve and maintain all the Documents as per the requirements of the Act, the Listing Regulations, Secretarial Standards, and other applicable laws.
2. All events or information disclosed under Regulation 30 of the Listing Regulations shall be available on the Company’s website for a period of 5 (five) years from the date of disclosure and thereafter archived for a further period of 1 (one) year or any such period as may be mandated by SEBI
3. All other statutory disclosures/information required to be hosted on the website shall be retained for the period specified under such statute. Where no period is prescribed, the information shall be hosted for 1 (one) year from the date of disclosure.

PRESERVATION OF DOCUMENTS AND INFORMATION

1. All documents as may be required under the applicable statute, laws, rules and regulations and whose preservation is permanent in nature shall be preserved permanently;
2. Certain categories of documents shall be preserved for a minimum period of 8 (eight) years after completion of the relevant transactions, such as but not restrictive to any show cause notice, demand notice, order, decree, direction from any Court, Tribunal, or any Judicial or Administrative Authorities.
3. The respective department of the Company shall be responsible for storing the physical form and Electronic Records of the Documents or keeping track of its location, as the case maybe, for the respective number of years.

4. The Company may engage third party to store and preserve the Documents, subject to applicable law with safety/security measures as may be required.
5. In case of any inconsistency in the Documents Preservation Schedule and the provisions of various Acts/Rules/Regulations applicable to the Company, such provisions shall prevail.
6. An employee, who seeks relieve from the company, shall transfer all digital records in his/her control to System Administrator before relieving him/her from the service of the company subject to the satisfaction of concerned functional heads.

MODE OF MAINTENANCE

The Company shall maintain records in physical or electronic form. Preservation shall be such that records remain authentic, accessible, and tamper-proof. Access shall be controlled by authorised personnel.

DISPOSAL AND DESTRUCTION OF RECORDS

After the expiry of the statutory retention period, documents may be destroyed as per applicable law

Disposal may be carried out in the following manner:

- I. Recycle non-confidential paper records;
- II. Shred confidential paper records;
- III. Delete or otherwise render unreadable electronic records

The Compliance Officer shall maintain a Register of Preservation and Disposal of Records.

DISCLOSURE

The above Policy and subsequent amendments thereto shall be disclosed on the Company's Website.

EFFECTIVE DATE

This Policy shall be effective from the date of listing of the equity shares of the Company on recognised stock exchange(s).

REVIEW AND AMENDMENT

The Policy shall be reviewed periodically by the Board of Directors. Amendments may be made with Board approval to align with regulatory changes.
