

## APEEJAY SURRENDRA PARK HOTELS LIMITED

### POLICY ON PRESERVATION OF DOCUMENTS

#### I. BACKGROUND

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”) require every Listed Company to formulate a policy on Preservation of Documents which has to be approved by the Board of Directors.

In this context, the following policy has been framed by the Board of Directors (“Board”) of Apeejay Surrendra Park Hotels Limited with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

This Policy can be modified and or amended with the approval of the Board of Directors only.

#### II. OBJECTIVE OF THE POLICY

The objective of this Policy is to classify the documents, records and registers of the Company which are required:

- (i) to be preserved permanently and
- (ii) to be preserved for a period of not less than 8 years.

#### III. DEFINITIONS

“**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 issued, sent, the time being in or 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 the Information Technology Act, 2000.

“**Electronic Form**” means on any electronic device such as computer, laptop, 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.

“**Preservation**” means to keep in good order and to prevent from being altered, damaged or destroyed.

#### IV. PRESERVATION OF DOCUMENTS

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to-time.

##### *Documents which are to be maintained permanently:*

The Company shall maintain the following documents on a permanent basis:

- a. All documents of registration received by the Company under the applicable statute, laws, rules and regulations, namely but not limited to certificate of incorporation, memorandum and articles of association, permanent account number, tax deduction account number, excise / service tax / goods and services tax / sales tax / export / import / other registration certificates, licenses, court orders, awards, patents, trademarks, copy rights shall be preserved permanently.
- b. Statutory records and registers that are required to be maintained permanently under the provisions of the Companies Act 2013 including annual financial statements with statutory auditor's report, annual report.
- c. Minutes of the board meeting, board committee meetings, general meetings of members etc. shall be retained in perpetuity in the Company's minute book.
- d. Documents relating to any property of the Company shall be retained perpetually.

##### *Documents which are to be maintained for at least eight financial years:*

- a. Books of account together with the vouchers relevant to any entry in such books of account
- b. Copies of all Annual Returns
- c. Disclosure of Interest received from the Directors of the Company in the manner prescribed
- d. Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
- e. Instrument creating a Charge or modifying a Charge, if any
- f. Changes to the Memorandum of Association and the Articles of Association, if any
- g. Register of deposits accepted or renewed, if any
- h. Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be
- i. Employment /Personnel Record in case of employees of the Company
- j. Relevant marketing and sales documents
- k. Press Releases
- l. Legal documents including but not limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters.

V. MODE OF MAINTENANCE

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

VI. DISPOSAL AND DESTRUCTION OF RECORDS

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.

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