

Policy for Archive, Preservation and Disposal of Documents

1. INTRODUCTION

Advani Hotels & Resort (India) Limited believes that good governance generates goodwill among business partners, customers and investors, earns respect from society, brings about a consistent sustainable growth for the Company and generates competitive returns for the investors. Timely disclosure of relevant information and preservation of the same for future reference, are two key elements for stakeholders to make informed decisions.

Document preservation is meant to serve the information and record management needs of a business, to comply with the regulatory requirements and to provide adequate and timely information to the stakeholders. The organization, storage, retention, and easy retrieval of business records help a Company's business operations and preserve its valuable information assets, its institutional knowledge, experience, business methods and practices. The principle of document retention is to preserve useful documents permanently or for the limited period of time during which their retention is useful or required by law to ensure corporate compliance with statutory and regulatory document retention rules and requirements.

The Company makes this Policy for Archive, Preservation and Disposal of Documents in compliance with the provisions of Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations) with the main objective to establish guidelines for the Company for preservation and archival of documents and orderly disposal of documents of the Company covered under this Policy.

2. EFFECTIVE DATE

This Policy is effective December 1, 2015.

3. DEFINITION

“Act” shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“Board of Directors” or **“Board”** means the Board of Directors of the Company.

“Company” means Advani Hotels & Resorts (India) Limited.

“Document” means any register, record or other document mandatorily required to be maintained by the Company as per the provisions of the Companies Act, 2013 and the rules made there under, the Securities and Exchange Board of India Act, 1992 and the regulations issued by the Securities and Exchange Board of India including any statutory modification and amendments or re-enactments thereof or under any other law for the time being in force whether maintained physically or electronically.

“Listing agreement” shall mean the uniform listing agreement executed in pursuant to Securities and Exchange Board (Listing Obligations and Disclosure Requirements) Regulations, 2015

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“**Policy**” means this Policy for Archive, Preservation and Disposal of Documents.

“**Regulations**” mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars or re-enactment thereof.

“**SEBI**” means the Securities and Exchange Board of India.

“**SEBI Regulations**” means the regulations made by SEBI in accordance with the Securities and Exchange Board of India Act, 1992 (the SEBI Act).

Any other term not defined under these presents shall have the same meaning as defined in the Companies Act, 2013 or the rules made there under, the SEBI Act or the SEBI Regulations.

4. APPLICABILITY

This policy shall apply to all the documents that are required to be maintained and preserved under the applicable provisions of the Act, the SEBI Act, the SEBI Regulations and any other acts, rules and regulation for the time being in force.

5. STATEMENT OF POLICY

All the documents required to be maintained by the Company are broadly categorized as:

- i. Statutory and Regulatory documents,
- ii. Other documents.
 - a. All the statutory and regulatory documents that are required to be maintained and preserved by the Company shall be maintained and preserved for such duration as may be specified by the relevant statute or regulation, as the case may be, governing the maintenance of the particular document.
 - b. Other documents shall be preserved either permanently or for such period as may be specified by the Company / Board from time to time.
 - c. All the documents, records that are statutorily required to be hosted on the website of the Company as per SEBI regulations or other applicable law, shall be hosted on the website for a minimum period of five (5) years or for such period as may be mentioned in the relevant law, whichever is longer.

6. DISPOSAL OR DESTRUCTION OF THE DOCUMENTS

All the registers, records, documents, covered under this policy, may be destroyed after the expiration of the applicable preservation period and the Company shall maintain a register entering the details of destroyed documents and the entries made therein shall be authenticated by the Secretary or any other person

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as may be authorized by the Board for this purpose. The list of registers, records, documents destroyed, in accordance with this policy, shall be placed before the Board, within 4 months of such destruction, for its information. Any disposal of registers, records, documents, which is not in accordance with this policy, shall be subject to prior approval of the Board.

7. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.