

# ElH Limited

(A member of The Oberoi Group)

## POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

### 1. BACKGROUND

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations) issued by Securities and Exchange Board of India vide its notification dated 2<sup>nd</sup> September, 2015 require every listed company to formulate a policy for retention and archiving of documents. In this context, this policy has been framed and approved by the Board of Directors in its meeting held on 26<sup>th</sup> May, 2016 for preservation and archiving the documents of the Company.

### 2. OBJECTIVE

The objective of the policy is to classify the documents, registers and records of the company into two categories –

- a. To be preserved permanently,
- b. To be preserved for a specific period of time.

The policy will also specify the manner in which the retention and archiving will be carried out and disposal of the documents after expiry of the period specified by the policy. For this purpose, documents will include documents in paper as well as electronic form.

### 3. DOCUMENTS TO BE RETAINED PERMANENTLY

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

- a. The original signed copy of the Memorandum and Articles of Association of the Company
- b. Minutes of General Meetings, Board Meetings and all Committee Meetings
- c. Register of Members, Register of Duplicate Share Certificates, Share Transfer Deeds, Common Seal Register.
- d. Register of Charges, Register of Loans and Guarantees, Register of Investments and Register of Contracts with Related Parties.

- e. All original copies of Management Agreements, Shareholders'/ Joint Venture Agreements
- f. All original copies of title documents and lease documents with respect to various pieces lands of the Company
- g. Register of directors and KMPs and Contracts of employment of Managing and Whole-time Directors.
- h. The absolutely final order in respect of a legal dispute which cannot be challenged in future.
- i. Intellectual property related documents like patents, copyrights, designs etc .

#### **4. DOCUMENTS TO BE RETAINED TEMPORARILY**

The Company shall maintain the following documents for the period specified against each of them:

- a. Records and documents that are required to be maintained as per the Companies Act, 2013 and the SEBI regulations, except those which will be permanently retained, will be retained for a period of 8 years.
- b. Books of accounts and supporting documents for any financial year will be retained for 8 years. In respect of the financial years for which the final tax assessment order is not yet passed because of a dispute, the books of accounts and other records will be retained till the final order is passed and 3 years thereafter, or 8 years whichever is higher.
- c. Employee related records will be retained for 8 years. However, personal data in respect of each employee will be retained throughout the period of such employee.
- d. All press releases by the Company will be retained for 8 years.
- e. All contracts entered into by the Company will be retained for a period of 8 years or 8 years after the expiry of the contract whichever is higher.
- f. Legal documents including but not limited to pleading documents will be retained for a period of 8 years. All interim orders will be retained for 8 years or till the final order is passed.
- g. Licenses will be retained till the validity and 8 years thereafter.

## **5. DISPOSAL OF DOCUMENTS**

After the retention period is over, steps will be taken for disposal of those documents in the following manner :

- a. Physical records in paper form will be disposed by using paper shredder.
- b. The records department will take appropriate method of disposing other forms of physical documents like photographs, audio/video records etc.
- c. IT department will take appropriate steps for permanent deletion of the electronic records.
- d. Any register or document which is required under the Companies Act or SEBI guideline's, other than records to be kept permanently, will be disposed off after taking approval of the Board of Directors of the Company.

## **6. COMPLIANCE**

The policy framed by the Company for retention and disposal of records will be followed throughout the company. Failure to comply with the policy may result in disciplinary action.