

## **POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY**

### **1. Scope –**

A Policy on preservation of Documents (defined below) would ensure safe – keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this Policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“ Listing Regulations”), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of Documents, but also the safe disposal/destruction of the Documents.

### **2. Definitions –**

- 2.1 “Act”** means the Companies Act, 2013.
- 2.2 “Applicable Law”** means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.
- 2.3 “Authorised Person”** means any person duly authorised by the Board.
- 2.4 “Board”** means the Board of directors of the Company or its Committee.
- 2.5 “Company”** means KAMAT HOTELS (INDIA) LIMITED.
- 2.6 “Current Document(s)”** means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- 2.7 “Document(s)”** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, 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, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.
- 2.8 “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.
- 2.9 “Electronic Form”** means any contemporaneous 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.
- 2.10 “Maintenance”** means keeping Documents, either physically or in Electronic Form.
- 2.11 “Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- 2.12 “Regulations”** means the Securities Exchange Board of India (Listing Obligation and

Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

### **3. Coverage**

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

### **4. Classification**

The preservation of Documents shall be done in the following manner: \*

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is "Current".
- c) In case of any other Document, for such period, as a competent officer of the Company is required to handle or deal with the Document takes a considered view about its relevance; Provided that generally speaking, a Document may be preserved for a period of 5 years from the date on which the Document was originated.

**\* An indicative list of the Documents and the timeframe of their preservation is provided in Annexure I**

### **5. Modes of preservation**

5.1 The Documents may be preserved in

- 5.1.1 Physical form or
- 5.1.2 Electronic Form.

5.2 The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

5.3 The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

### **6. Authority for approval of Policy**

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted **via** the Regulations.

## **7. Authority to make alterations to the Policy**

The Board is authorized to make such alterations to this Policy as considered appropriate, however, subject to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

## **8. Destruction of Documents**

8.1 Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for shortterm use only. This applies to both Physical and Electronic Documents.

8.2 The temporary Documents, excluding the Current Document(s) may be destroyed after the relevant or prescribed period, by the Person in whose custody the Documents are stored, as per applicable law, with the permission of applicable authority if required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice are listed in Annexure II

8.3 A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.

**The format of the register has to be in accordance with AnnexureIII.**

## **9. Conversion of the form in which the Documents are preserved**

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

## **10. Authenticity**

Where a Document is being maintained both in Physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

## **11. Interpretation**

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

## **Annexure – I**

→ **Indicative list –**

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
<ul style="list-style-type: none"> <li>• The memorandum and articles of the Company</li> <li>• Register of members including index of names.</li> <li>• Register of Loans, guarantee, security and acquisition made by the Company.</li> <li>• Registers of contracts with related party and contracts and Bodies corporate in which Directors are interested</li> <li>• Registers of investments not held in its own name by the Company.</li> <li>• Books and Documents relating to the issue of share certificates, including the blank forms of share certificates (not less than 30years and in case of disputed cases, shall be preserved permanently)</li> <li>• Register of charges</li> <li>• Minutes book of general meeting</li> <li>• Minutes of Board and Committee Meetings</li> <li>• Register of Renewed and Duplicate Share Certificates</li> <li>• Certificate issued under Regulation 7(3) of Listing Regulations.</li> <li>• Quarterly Certificate under Regulation 13(3) of the Listing Regulations.</li> <li>• Quarterly Compliance Certificate under Regulation 27(2) of the Listing Regulations.</li> <li>• Disclosure made Regulation 30 of the Listing Regulations (shall be hosted on the website of the Company for a period of 5years and thereafter as per the Archival Policy of the Company.</li> <li>• Shareholding Pattern as per Regulation 31 of the Listing Regulations.</li> <li>• Annual Reports of the Company.</li> <li>• Certificate under Regulation 40(9) of the Listing Regulations.</li> <li>• All Policies as well as Code of Conduct formulated under Companies Act, 2013 and the Listing Regulations.</li> </ul>	<ul style="list-style-type: none"> <li>• Instrument creating charges charge or modification (8 years from the date of satisfaction of Charge)</li> <li>• Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)</li> <li>• Books of Accounts including vouchers relevant to any entry in such Books of Accounts.</li> <li>• All notices pertaining to disclosure of interest of directors (8 years from the end of the financial year to which it relates)</li> <li>• All certificates surrendered to a company (3 years from date of surrender)</li> </ul>
<u>Secretarial Standard</u>	

Minutes of Board meeting and General Meeting (SS1 and SS-2)	<ul style="list-style-type: none"> <li>Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-1 and SS2)</li> </ul>
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## Annexure II

The following categories of Documents may be destroyed as normal administrative practice:

- catalogues;
- copies of press cuttings, press statements or publicity material;
- letters of appreciation or sympathy, or anonymous letters;
- requests for copies of maps, plans, charts, advertising material (subject to Clause 9 and 10 of this Policy);
- facsimiles where a photocopy has been made; telephone message;
- drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 9 and 10 of this Policy); and
- routine statistical and progress reports compiled and duplicated in other reports(subject to Clause 9 and 10 of this Policy)

## Annexure III

### The format of the register of Documents disposed/destroyed –

PARTICULARS	OF	DATE AND MODE	OF	INITIALS	OF	THE
DOCUMENT	ALONGWITH	DESTRUCTION		AUTHORISED	PERSON	
PROVISION OF	APPLICABLE					
LAW						

## **ARCHIVAL POLICY**

### **Archival Procedure:**

The disclosures made to stock exchanges would be provided to the concerned person handling the website of the Company by the Company Secretary Department for uploading on the website of the Company.

The information provided to concerned person would be promptly uploaded on the website of the Company and would be hosted on the website for five years period from the date of such hosting under “Investor” section.

Thereafter, the information would be archived under the heading “Past Events/Information” and would be retained on the website for such period as may be decided by the Executive Chairman and Managing Director.

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