

U P HOTELS LIMITED

WEBSITE CONTENTS ARCHIVAL POLICY

1. INTRODUCTION

The Securities and Exchange Board of India (SEBI) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations, 2015”) which shall be applicable to all listed entity with effect from 1st December, 2015. The Listing Regulations, 2015 shall replace the existing Listing Agreements entered into by the Company with the Stock Exchanges.

Regulation 30(B) of the Listing Regulations, 2015 is re-produced as under:

Disclosure of events or information

The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

2. OBJECTIVE

The objective of this policy is to prescribe a policy for archival of disclosures of events or information which has been disclosed to the stock exchange(s) under Regulation 30 of the Listing Regulations, 2015 and hosted on the website of U P Hotels Limited (“Company”) and transferred to the Archives folder of the website of the Company after the completion of 5 years from the date of disclosure or event.

3. APPLICABILITY AND EFFECTIVE DATE

This policy shall be applicable to the Company with effect from 1st December, 2015.

4. POLICY

The Company shall after making disclosure of the events or information to the stock exchange(s) also host such information on its website (www.hotelclarks.com).

The disclosures so placed on the website, shall be maintained for a period of five years on the website of the Company. The period of five years shall be reckoned from the date of such events or information being placed on the website of the Company for the first time.

Other material developments for events or information which are disclosed to the stock exchange(s) shall also be placed on the website of the Company for a period of five years.

All such events or information so disclosed on the website of the Company in pursuance to Regulation 30 of the Listing Regulations, 2015 shall be archived after the expiry of the five years from the date of such posting and moved to the location or place under – “Historic Material Events / Information”

The events / information so archived under “Historic Material Events / Information” shall be preserved for a further period of three years or till the time such events or information are resolved or closed, whichever is later.

In addition to maintaining the records on the website, the Company shall also maintain the physical copies of such disclosure made to the stock exchange(s) which shall be preserved for the period the Company’s Policy on Preservation of Documents.

5. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

6. DISCLOSURES

The company shall disclose the Policy on its website.