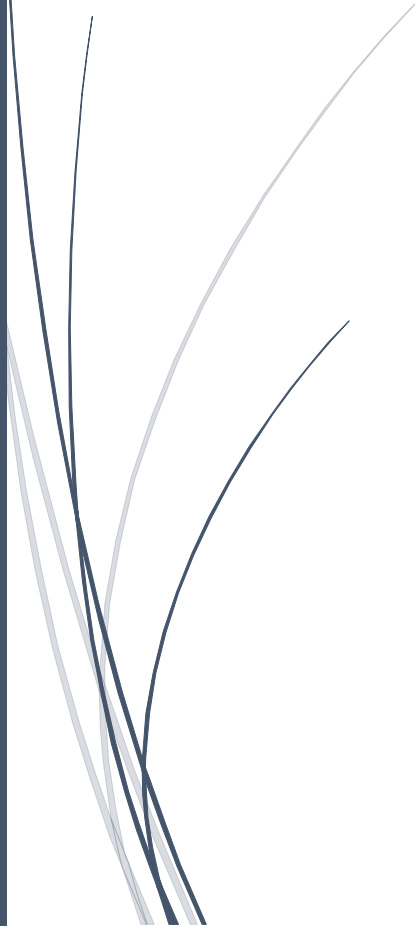




Embassy Property Developments Pvt Ltd
Policy on Preservation of Documents and Archival
Policy



Preamble:

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, mandates listed entities to formulate a Policy for preservation and archiving of documents. It is in this context that the Preservation of Documents and Archival Policy (“Policy”) is being framed and implemented.

Scope:

This policy is intended to establish guidelines for the maintenance, management and orderly disposition of corporate records/documents. The Company recognises that all the documents, whether in physical or electronic mode, form an important and integral part of the Company’s records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Purpose:

The purpose of the policy is to facilitate the following:

- i. Identification of records that are to be maintained permanently or for any other shorter period of time of not less than eight years after completion of the relevant transactions.
- ii. Deciding the mode of preservation of documents, whether in physical form or in electronic form.
- iii. Retention of records for the period required by applicable laws and regulations and for other business reasons for a period that will reasonably assure their availability when needed.
- iv. Preservation of the confidentiality and security of records.
- v. Systematic and nonselective disposition of records not necessary for legal or business reasons.

Definition:

- a) “Act” means the Companies Act, 2013.
- b) “Applicable Law” means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA), The Institute of Company Secretaries of India (ICSI from time to time).
- c) “Board” means the Board of the Directors of the Company.
- d) “Books of Accounts” includes records maintained in respect of –
 - all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure takes place.
 - All sales and purchases of goods and services by the Company.
 - The assets and liabilities of the Company; and
 - The items of cost as may be prescribed under section 148 of the Act in case the Company belongs to any class of companies specified under that section.
- e) “Company” means Embassy Property Developments Limited.

- f) “Documents” refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan 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.
- g) “Electronic Form” means any electronic device such as servers, computer, laptop, compact disc, pen drive, 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 to access it.
- h) “Maintenance” means keeping documents, either physically or in Electronic Form.
- i) “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.
- j) “SEBI LODR” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, or any other applicable law.

Roles and Responsibilities:

The respective Functional/ Departmental heads of the Company shall be responsible for identification, maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

Record Type and Preservation:

All the documents can be categorised and preserved based on the below criteria:

A. Documents whose preservation shall be permanent in nature:

Documents so identified, shall be maintained permanently in the archives of the Company, and include such documents which:

- a) Property records including purchase and sale deeds, licences, copyrights, patents & trademarks
- b) Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders’ Meetings, Register of Members and other Statutory Records
- c) Personal files of all live employees
- d) Any other record as may be decided by the Chief Executive Officer of the Company from time to time.

B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions:

1. Books of Accounts, Bank Statements and vouchers
2. Filings with Stock Exchanges, Registrar of Companies and other statutory authorities.
3. Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retiral related Records, etc.
4. Notices, Agenda, Notes on Agenda, Attendance and other related papers of meeting
5. Corporate Social Responsibility Records
6. Sponsorship Projects Records
7. Correspondence and Internal Memorandum
8. Any other record as may be decided by the Chief Executive Officer or Board of Director or Company Secretary of the Company from time to time.

C. Documents whose preservation shall be for a minimum period of three years after completion of the event:

1. Tender Documents
2. Lease Deeds and Contracts
3. Legal files
4. Insurance Records including policies and claims
5. All e-mail correspondence, internal & external
6. Documents under Companies Act 1956/2013 and Secretarial Standards
7. all other documents/ records which have been so decided to be preserved by the Function Heads, either under their own respective judgement or as required to be preserved by any specific Law.
8. Any other record as may be decided by the Chief Executive Officer of the Company from time to time.

D. Statutory Requirements:

If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

E. Web Archival Policy

1. The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s).
2. Such disclosures shall be retained on the website of the Company for a minimum period of five years.
3. At the end of the fifth year the information shall be archived and preserved for a further period of three years.

F. Other Functional Documents / Records:

The documents which are of routine nature and as may be categorized as such by the Function Heads.

Destruction of Documents:

The documents which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads. Any deviation will be approved by the Board.

However, if a legal issue involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, must cease immediately. Documents relating to the lawsuit or potential

legal issue will then be retained and organized under the supervision of the Group Legal Head or such other person equivalent to such position. In such an event, the IT Department may immediately disable the “permanent delete” and “automatic delete” functions of the Company’s software with respect to the designated records and disable the automatic deletion of recycle bins and deleted items folders on appropriate Company computers; and the Group Legal Head shall immediately notify all appropriate employees by e-mail that they are not to dispose of relevant Temporary Records or other records until notified otherwise.

Compliance and Violation:

Failure to comply with this Document Retention and Archival Policy may result in disciplinary action.

Dissemination of the Policy:

The approved Policy shall be uploaded on the Company’s website www.embassyindia.com

Review of Policy:

This Policy shall be subject to review, if necessary. Any change/amendments in applicable laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this policy shall be approved by the Board.
