



SAYAJI HOTELS (PUNE) LIMITED

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POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

(Approved by the Board on 11th August, 2023)

BACKGROUND

The Securities and Exchange Board of India vide its notification dated September 2, 2015 issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (herein after referred as “Listing Regulations”) inter alia mandate listed entities to frame Policy(s) for preservation and archiving of Documents.

In terms of Regulation 9 of Chapter III of the Listing Regulations, the Company is required to frame policy for preservation of documents. Further, in terms of Regulation 30(8) of Chapter IV of the Listing Regulations the Company is required to 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 Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.

DEFINITIONS

“**Act**” means the Companies Act, 2013 including any amendment or modification thereof.

“**Applicable laws**” mean the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the applicable provisions of Companies, 2013, as amended along with the rules framed thereunder.

“**Archive**” is an accumulation of historical records whether maintained in physical mode or electronic mode. Archives contain primary source documents that have accumulated over the course of an organization’s lifetime, and are kept to show the function of that organization.

“**Board of Directors**” or “**Board**” means Board of Directors of Sayaji Hotels (Pune) Limited.

“**Documents**” means papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other records of the Company required under or in order to comply with the requirements of any applicable laws 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.

“**Preservation**” means maintenance of documents, files and documents in usable form.

“**SS-1**” means Secretarial Standard-1 for the Board Meetings as notified by the ICSI.

“**SS-2**” means Secretarial Standard-2 for the General Meeting as notified by the ICSI.

CLASSIFICATION OF DOCUMENTS

For the purpose of the Policy, the Documents of the Company are classified as follows:

- a. The list of Documents which shall be permanently preserved is given in **Annexure A** to this

Policy. The Company shall permanently preserve these Documents subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the Documents shall also be preserved permanently by the Company.

- b. The list of Documents which shall be preserved for a period not less than 8 years after completion of the relevant transaction is given in **Annexure B** to this Policy. The said Documents shall be preserved subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the Documents shall also be preserved for the said period.

RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS AND MONITORING THE POLICY

The Company Secretary and in absence thereof the Key Managerial Personal appointed by the Board of directors of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area and also be responsible for monitoring the Policy.

MODES OF PRESERVATION

The Authorized Person shall:

- a. preserve the Documents either in physical form or electronic form;
- b. preserve the Documents in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents;
- c. ensure that the preserved Documents are accessible at all reasonable times;
- d. control access for preserved Documents, to ensure integrity and confidentiality of the Documents and prohibit unauthorized access;
- e. make appropriate provisions for back up of all preserved Documents, both physically and electronically.

DISPOSAL OF DOCUMENTS

Disposal of documents after said period of 8 years (whose preservation shall not be permanent in nature) shall be done in the presence of Authorized person in method prescribed by Board of Directors. Before disposing a soft copy shall be taken for the record.

ARCHIVAL POLICY

- a. The Company will host all the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations on the website of the Company under the section entitled [“Investors”] for a period of five years and thereafter the same shall be archived for retrieval for such period as decided by the Compliance Officer and Managing Director of the Company.
- b. Subsequently, anyone intending to review archived information and events communicated to

the stock exchanges may write to the Compliance Officer of the Company.

- c. This Policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.
- d. Adoption of this Policy shall be communicated to the stock exchange(s) where the Company's equity shares are listed. This Policy shall also be disclosed on the website of the Company.

AMENDMENT

The Board may modify, add, delete or amend any of the provision of this Policy as and when they deems necessary.

ANNEXURE A

Documents / Record whose preservation shall be permanent in nature

Notwithstanding anything contained herein the Act, SS-1 and SS-2 the following documents/ records maintained under the Act, Rules and Regulations shall be preserved permanently: -

S. No.	Documents/Records
1.	Certificate of Incorporation
2.	Financial Statements, duly signed annual reports
3.	Minutes of all the General Meetings, Board & Committee Meetings
4.	Disclosures made under the SEBI Insider and Takeover Regulations and the SEBI (LODR) Regulations, 2015 to the Stock Exchange from time to time
5.	Memorandum and Articles of Association of the Company as may be amended from time to time
6.	Letter of Offer related to public issue, right issue, further issue, buy back offer, etc.
7.	Agreement with the Share Transfer Agent, Depositories, Stock Exchanges and other material agreements
8.	Statutory Register as per Companies Act which are required to be preserved permanently
9.	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Registers
10.	Authorization / licenses obtained from any statutory authority
11.	Policies of the Company framed under various regulations
12.	Policies of the Company framed under various regulations
13.	Any other document, if Board of Directors may think deemed fit.

ANNEXURE B

Documents / Records to be preserved for a minimum period of eight years

Notwithstanding anything contained herein the Act, SS-1 and SS-2 the following documents/ records maintained under the Act, Rules and Regulations shall be preserved for a period of not less than 8 Years:

S. No.	Documents/Records
1.	Notice of the Board meetings given to the Stock Exchange for considering matters relating to pre-intimations required to be submitted to the Stock Exchange.
2.	Date for the Book Closures and Record dates for various purposes as may be decided by the Company from time to time
3.	Quarterly and half yearly and annual financial results of the Company including: - Annual accounts - Directors report - Auditors report
4.	Quarterly Shareholding Pattern including details for pledge of shares and any changes therein.
5.	List of Unpaid Dividend to the shareholder
6.	Change in the constitution of the Board of directors, KMP, Compliance Officer, Auditors, Secretarial Auditors, Share Transfer Agent
7.	Any price Sensitive Information given or provided to the Stock Exchange under Regulation 30 of the SEBI (LODR) Regulations, 2015.
8.	Recommendation and payment of dividend to the shareholders
9.	Corporate Governance Report submitted to the Stock Exchange on quarterly and annual basis.
10.	Copy of the orders issued by the SEBI or Stock Exchanges relating to securities listed with the Stock Exchanges.
11.	Disclosures made under companies Act, in form MBP-1.
12.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act
13.	Annual Returns as per Companies Act
14.	Books of accounts including Vouchers / Voucher register as defined under the Companies Act
15.	Income Tax Returns filed under Income Tax Act, 1961
16.	Return of declaration in respect of beneficial interest in any share as per Companies Act
17.	Copy of newspaper advertisement or publications
18.	Compliance Reports received from any statutory authority

19.	Disclosure/Return filed under SEBI Listing Regulations
20.	Office Copies of Notices, Agenda, Notes on Agenda, results of Board Meetings and Board Committees and other related papers
21.	Office Copies of Notices, Scrutinizer's Report, results and related papers regarding General Meetings (including AGM)
22.	Any other Document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act and/or the SEBI Listing Regulations