



## POLICY FOR PRESERVATION OF DOCUMENTS

### BACKGROUND

In accordance with provisions of Section 94 read with Rule 15 of the Companies (Management and Administration) Rules, 2014 and Regulation 9 of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended (the “**Listing Regulations**”), Bharat Hotels Limited (the “**Company**”) is required to frame a policy for preservation of documents (“**Policy**”), under which the documents will be classified into two categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than eight years after completion of the relevant transaction.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness, and information. The Company recognizes 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.

Accordingly, the Board of Directors of the Company has adopted this Policy pursuant to a resolution dated 12-2-2018.

#### 1. Definitions:

- a) “Applicable Law” means any law, rules, circulars, guidelines or regulations, including those that are issued by the Securities and Exchange Board of India (SEBI), the Ministry of Corporate Affairs (MCA) and other professional bodies under which the preservation of documents has been prescribed.
- b) “Board” means the Board of Directors of the Company.
- c) “Company” means Bharat Hotels Limited.
- d) The words, terms and expressions used in this Policy shall have the same meaning as given in Regulation 2 of Chapter I of the Listing Regulations.

## **2. Applicability and Modes of Preservation:**

This Policy is applicable to all documents maintained in physical and electronic mode by the Company (including documents specified in **Annexure A**).

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

The documents not specifically covered under this Policy shall be preserved and maintained in accordance with the provisions of Applicable Law under which those documents are maintained.

The Company shall make appropriate provisions for back up of all documents preserved both physically and electronically.

## **3. Roles & Responsibilities:**

The respective functional/ departmental heads of the Company shall be responsible for 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.

## **4. Authenticity:**

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

## **5. Destruction of Documents:**

The documents specified in Annexure A 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 of the relevant functional/ departmental heads.

## **6. Dissemination of the Policy:**

The approved Policy shall be uploaded on the Company's website, [www.thelalit.com](http://www.thelalit.com).

## **7. Compliance**

All employees of the Company are required to comply with the provisions of this Policy. Failure to comply with this Policy by any employee of the Company may result in disciplinary action by the Company, including suspension or termination of employment.

## **8. Amendments**

The Board reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

**DATE: 12-02-2018**

**ANNEXURE-A**

**Documents Preservation Schedule**

<b>Sr. No</b>	<b>Concerned Department</b>	<b>Records</b>	<b>Preservation Period</b>
1	<b>Secretarial</b>	Certificate of Incorporation, Certificate of Change in Name etc.	Permanent
		Statutory Registers	
		Register and Index of Members	
		MCA Forms	
		Scrutinizers Reports	
		Annual Audit Reports and Financial Statements	
		Minutes of Board and Committee Meetings	
		Minutes of all meetings of shareholders	
		Statutory filings with the Stock Exchanges, SEBI, Ministry of Corporate Affairs, Reserve Bank of India and any other statutory/ regulatory authority	
		Applications and approvals for issuance and listing of securities	
		Annual Returns	
			8 Financial Years
		General Meeting Attendance Register	
		Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	
Office copies of Notice of General Meeting and related papers			
		Board Agenda & supporting documents	
2	<b>Legal</b>	Original Property Purchase and Sale Agreement	Permanent
		Property Card, Ownership records issued by Government Authority	
		Court Orders	
		Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 Financial Years after termination or expiration of contracts
	<b>Finance, Account &amp; Taxation</b>	Annual Audited and Financial Statements	Permanent
		Investment Records	8 Financial Years
		Journal Entry support data	

		Engagement letters from Auditors	
		Books of Accounts, Ledgers and Vouchers	8 Financial Years from the end of Financial Year or completion of assessment under Income Tax whichever is later
		Excise Records	
		Tax Deducted at Source Records	
		Income Tax papers	
		Service Tax papers	