



POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

[Pursuant to Regulation 9 and 30(8) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]



Policy on Preservation of Documents and Archival Policy

Preface

The Board of Directors (**the “Board”**) of Apollo Sindoori Hotels Limited (**the “Company”**) has adopted the following policy with regard to preservation and archival of Documents. Regulation 9 of the Securities Exchange Board of India (**“SEBI”**) (Listing Obligation and Disclosure Requirements) Regulations, 2015 requires the Company to frame a policy on preservation of documents. Further, Regulation 30(8) requires the Company to frame a Policy on website disclosure and archival of such disclosures.

In compliance to the aforesaid regulation, this policy is formulated to define a process for preservation of documents and to further develop a guideline for archival of such documents including those which are maintained in the electronic form and are disclosed on the website of the Company. In other words, the Policy further encompasses the manner of archival of the documents which have been disclosed on the website of the Company for the time frame prescribed in various Regulations.

Purpose of the Policy

This policy sets the standard for classifying, managing and storing of records of the Company. The purpose of this policy is to establish a framework for effective record management and the process for subsequent archival of such records.

Definitions

“Applicable Law” means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the Documents has been prescribed.

“Board” in relation to the Company, means the collective body of the directors of the Company.

“Company” means Apollo Sindoori Hotels Limited.

“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 accessible to the Company.

“Regulations” mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, including any modifications, clarifications, circulars or re-enactment thereof.

“Records / Documents” includes and contains all relevant information relating to the Company and necessary documentations required to be maintained under the Applicable Law.



“**Policy**” means this Policy on Preservation of documents and Archival Policy and as may be amended from time to time.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Regulations or any other applicable law or regulation to the extent applicable to the Company.

Type of documents and time period for preservation

The company shall maintain and preserve documents as specified hereunder:

Category (A):

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is listed in **Annexure–A**

Category (B):

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years after completion of the relevant transactions shall be preserved accordingly. Detail of documents with preservation period of not less than eight years after completion of the relevant transactions is listed in **Annexure–B**.

Category (C):

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in Category (A) & (B) above shall be preserved accordingly. Notwithstanding anything contained in this policy in case of dispute with authorities or government authorities, records and documents relating to dispute will be preserved till the settlement of dispute or eight years whichever is later.

Preservation principles

1. The Company shall disclose on its website all such events and information which have been disclosed to the Stock Exchanges under Regulation 30 of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a period of five years from the date of disclosure to the Stock Exchanges. For ensuring safety of the data hosted on the website of the Company, a back-up of the website shall be taken at least on a regular intervals.
2. After five years, such disclosures shall be removed from the Company’s website and preserved in a secured server of the Company. Such disclosures shall be preserved in a logical manner viz. as per nature/date of the disclosure, etc. to facilitate easy retrieval as and when required.



3. Physical preservation shall be ensured in proper store / record rooms, access to which shall be allowed to only persons authorised.

Destruction of documents

The documents / records should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use. The documents / records referred to in Annexure B shall be preserved for at least 8 years (or additional period decided by the Company) may be disposed of after the expiry of the periods of their preservation, after the approval of the concerned HODs of the Company.

Amendments

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. The policy was last reviewed by the Board on 19-05-2023.

Annexure A

Documents whose preservation shall be permanent in nature:

Sr. No.	Nature of Document(s)
1	All documents and Information originally filed with ROC for Incorporation of Company
2	Memorandum of Association and Articles of Association as originally filed and updated from time to time
3	Register of Members
4	Index of Members
5	Minutes of General Meeting
6	Minutes of Board Meeting
7	Minutes of various Committee Meetings
8	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

Annexure B

Documents with preservation period of not less than eight years after completion of the relevant transactions:

Sr. No.	Nature of Document(s)
1	Books of Accounts
2	Annual Return(s)
3	Statutory Registers
4	Tax related records and documents
5	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time