



BRIGADE HOTEL VENTURES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

Policy Ownership

Owner : Company Secretarial

Policy Change Log

Version	Issued on	Effective from
1	<i>October 5, 2024</i>	<i>October 5, 2024</i>



BRIGADE HOTEL VENTURES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1) PREAMBLE

This policy has been framed pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

The policy aims to classify the documents, records and registers of the Company either in physical or electronic form as given herein:

- a) Documents whose preservation shall be permanent; and
- b) Documents to be preserved for not less than eight years.

The Board has the power to modify and amend the said Policy.

2) DEFINITIONS

- a) "**Company**" shall mean Brigade Hotel Ventures Limited.
- b) "**Documents**" shall mean all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force and shall include those created and maintained in the electronic form (recognized by Section 4 of the Information Technology Act, 2000).
- c) "**Electronic Form**" means on any electronic device such as computer, laptop, compact 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 the Company has control over access to it.
- d) "**Maintenance**" means keeping Documents either physically or electronic form.
- e) "**Preservation**" means to keep in good order and to prevent from being altered, damaged or destroyed.

3) PURPOSE

The purpose of this policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the relevant statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are destroyed after following the due process for destruction of the same.

4) PRESERVATION AND ARCHIVAL OF DOCUMENTS

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to-time. While this Policy lays down the minimum period for preservation of documents, the retention of documents as identified specifically in the Policy and documents not identified herein should be determined by the relevant Head of the Department by applying general guidelines and other important factors.

a) Documents whose preservation shall be permanent:

- Memorandum and Articles of Association as amended from time to time
- Certification of Incorporation
- Minutes of the Board, Committees of the Board, and General Body meetings
- Licenses, Registration Certificates, Permissions and Approvals
- Documents relating to intellectual property rights such as patent applications and granted patents
- Audited Financial Statements
- Documents relating to properties owned by the Company
- Register and Index of Members
- Register of Contracts with related parties in which directors are interested
- Register of Directors and Key Managerial Personnel and securities held by them
- Register of Loans and Investments made by the Company
- Register of Charges
- Register of records and documents destroyed
- Listing Agreements executed with stock exchanges
- Trading approval relating to listing of securities
- Offer documents for public issue and private placement of securities filed with the SEBI
- Any other document as may be required to maintain in terms of applicable law(s), if any.

b) Documents to be Preserved for not less than 8 years from the date of its event

- Books of Accounts together with the vouchers and bills
- Annual Returns along with Annexures
- Disclosure of interest received from the Directors of the Company
- Attendance Registers, Notices, Notes to agenda and other related documents pertaining to the Board, Committees of the Board and General Meetings
- Scrutinizer's Report on Postal Ballot and Annual General Meetings
- Instrument creating charge or modifying the charge
- Return of declaration in respect of beneficial interest in any share
- Forms and returns filed with Reserve Bank of India/ Ministry of Corporate Affairs or with any other statutory authority
- Insurance Policies/ Claims under various policies
- Non-Statutory Registers/ Documents



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- Register of debenture holders or Register of any other security issued by the Company
- Register of buy back of Securities from the date of completion of buy-back
- Register of Transfer and Transmission of Shares, Debentures or other securities
- Employment/ Personal records in case of employees of the Company
- Relevant marketing and sales documents
- Press Releases
- All reports filed with stock exchanges from time to time
- Books of accounts and tax records shall be retained for at least 8 years following the completion of the relevant transactions or assessment year for which the records were last used or as per the requirement of the relevant statute.
- Legal documents including but not limited to Contracts (8 years after expiry), Interim Orders, Pleadings before Courts, Orders passed by the Courts or Tribunal or any other authority empowered to give a decision on any matter, Awards, documents relating to property matters.
- Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

c) Documents which are to be maintained on website of the Company for a minimum period of five (5) years:

- Disclosure of all events and information provided to the Stock Exchanges as per the Listing Regulations
- Investor Presentation and audio video recordings/transcripts of investor calls
- Press Release.

The above documents as uploaded on the Company's website will be archived for a period of Five (5) years and thereby destroyed as per this Policy

5) MODE OF MAINTENANCE

The Company shall maintain these records either in physical or in Electronic Form. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to. All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

6) DISPOSAL AND DESTRUCTION OF RECORDS/ DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.



7) DOCUMENTS ON LITIGATION HOLD

In the event of a 'Litigation Hold' initiated by the Legal Department of the Company in connection with a statutory investigation or dispute before a court or tribunal, the Documents covered by the Hold shall not be destroyed until the hold is lifted by the Legal Department.

8) REVIEW

This policy will be reviewed periodically by the Board as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to the necessary approvals of the Board of Directors in cases of material changes to the Policy.

This Policy was approved by the Board on October 5, 2024.



ARCHIVAL POLICY

The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires listed companies to disclose on its website all events or information which are to be disclosed to the Stock Exchange(s) under this regulation and such disclosure shall be hosted on the website of the Company for a minimum period of five and thereafter as per the archival policy of the Company, as disclosed on its website.

Brigade Hotel Ventures Limited shall host all events and information disclosed to the Stock Exchanges on its website for a period of not less than five years as approved by its Board of Directors pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This policy will be effective on and from the date on which the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 becomes effective.
