

ROBUST HOTELS LIMITED

PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

INTRODUCTION

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations') and The Companies Act, 2013. Archival Policy as referred to in Regulation 30(8) of the Listing Regulations also forms part of this Policy.

PURPOSE

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents approved by its board of directors, either in physical or electronic form, classifying them in at least two categories as follows:

- a) documents whose preservation shall be permanent in nature;
- b) documents with preservation period of not less than eight years after completion of the relevant transactions.

Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 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.

Accordingly, this policy has been framed keeping in view particularly the requirements of Listing Regulations.

PLACE OF PRESERVATION / MAINTENANCE

The records shall be preserved / maintained at the Registered Office of the Company unless any other law requires it to be maintained at any other place, in which case the same shall be kept at such place.

STORAGE AND SECURITY CONDITION

The records should be stored in conditions that are secure and clean with low risk of damage. Records of non-paper format shall require special storage conditions and handling process, after taking into account their specific charter. Similarly, records of continuing value and requiring longer preservation shall require a higher quality of storage.

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INFORMATION PUBLISHED ON THE WEBSITE OF THE COMPANY

The information required to be statutorily published on the website of the Company as per Regulation 30 of the Listing Regulations shall be hosted on the website of the Company for a minimum period of 5 years.

DESTRUCTION OF RECORDS

The Vice President & CFO and Company Secretary are responsible for the ongoing process of identifying its records, which have met the required retention period and overseeing their destruction as per prevailing practices. They are also responsible for the maintenance of list of documents destroyed.

AMENDMENT

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

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INDICATIVE LIST	
Permanent Preservation	Temporary Preservation
<ul style="list-style-type: none"> - The Memorandum and Articles of the Company - Documents relating to incorporation of the Company - Minutes book of Board / Committee / general meeting, resolutions passed by postal ballot, resolutions passed by circulations. - Licenses, approvals, permissions, agreements, IPR's certificates or any other document which the Board thinks expedient to preserve. 	<ul style="list-style-type: none"> - Secretarial Records including annual return, Statutory registers and any other documents should be maintained as per Section 94 and any other applicable provisions of Companies Act, 2013 and further amendments thereof. - Books of Accounts as per the provisions of Section 44A of Income Tax Act 1961 and Rule 6 (F) of Income Tax Rules 1962 shall be maintained in terms of the above provisions of laws. Besides books of accounts, audit reports, applications, stock records, general ledger and journals, tax returns, demand notices, assessment orders, financial statements, certificates and other documents should be maintained as per the discretion of the management. - Records of the Courts/Tribunals and/or any other Statutory Bodies should be maintained as per the progress of the case and discretion of the management. - Various contracts entered by the Company (8 years beyond the life of the agreement and longer in case of publicly filed contracts at the discretion of the management.

Electronic Mail: E-mail that needs to be saved should be either printed in hard copy and kept in the appropriate file or downloaded to a computer file and kept electronically or on disk as a separate file or in archive mail. The retention period depends upon the subject matter of the mail as per discretion of the management.

Records of Operating Hotel of the Company should be preserved in terms of the regulatory requirements and operational convenience, references or for future requirements. The General Manager of the hotel shall be responsible for maintenance, preservation or

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destruction of the records of the hotel. The Company Secretary shall intimate to the General Manager on the adoption of this policy by the Board.

The above list is informative and any other documents/registers/records/correspondences etc not mentioned above should be maintained/preserved/destroyed as per discretion of the management taking into account all other related factors including legal requirements.