

POLICY ON PRESERVATION OF DOUCMENTS & RECORD

Under Regulation 9 and 30(8)

Pursuant to (Listing Obligation and Disclosure Requirements Regulations, 2015)

1. INTRODUCTION:

Corporate Records are valued as Corporate Assets and includes all documents and records which are in physical mode as well as electronic form. The Securities and Exchange Board of India ("SEBI") has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR").

Regulation 9 of LODR mandates the Listed entities to formulate a Policy for preservation and archiving of documents.

The Board of Directors ("the Board") of Grand Continent Hotels Limited has adopted the following for "Policy on Preservation of Documents & Records" ("Policy") and the Board may amend this Policy from time to time.

2. OBJECTIVE OF THE POLICY:

The objective of this policy is to determine the period for maintenance, preservation and disposal of physical and electronic documents and records of the Company.

This Policy defines the time period for which the disclosed information shall be archived beyond the mandatory hosting period considering the requirements of various statutes, law, regulations etc. and other legal and administrative aspects.

3. DEFINITIONS

1. "Archival" means accumulation/storage of historical records on server/network or at a physical place.
2. "Board of Directors" or "the Board" means the Board of Directors of the Company.
3. "Company" shall mean Grand Continent Hotels Limited.
4. "Documents" or "Records" mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company.
5. "Preservation" or "preserve" means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.

4. GOVERNING REGULATION:

As per the Companies Act, 2013 read with Regulation 9 of the LODR requires listed entities to have a Policy on Preservation of documents approved by its Board of Directors, classifying the documents in at-least two categories, which are as follows:

- i. Documents' preservation of which shall be permanent in nature; and

- ii. Documents with preservation period of not less than eight years after completion of the relevant transactions.

5. SCOPE AND APPLICABILITY

1. The Policy covers all relevant documents and records generated during the course of operations of the Company.
2. This policy will be applicable to the Company and its subsidiaries.

6. PRESERVATION:

1. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the LODR and the secretarial standards and other applicable law, rules, regulations (collectively, called "Statutory Provisions") and internal policies of the Company, in force.
2. The concerned departmental head will be responsible for the maintenance, preservation and destruction of Documents and Records pertaining to the respective Departments.
3. Documents and Records which are required to be preserved by virtue of applicable laws and regulations shall be preserved either permanently or for such periods as may be mandated by applicable laws from time to time.
4. Documents and Records which are required to be preserved for a period of not less than 8 (eight) years after completion of the relevant transactions (or such time period stipulated in the LODR and other laws and statutes applicable to the Company from time to time) shall be preserved for such stipulated time period as specified by the relevant head of departments of the Company from time to time.
5. The relevant head of departments of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the documents (authorized person).

7. MODES OF PRESERVATION:

1. The documents may be preserved either in physical form or electronic form.
2. The preservation of Documents should be 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.
3. The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure the integrity and confidentiality of the documents and prohibit unauthorized access.

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

8. ARCHIVAL

1. The information on Material Events as per Regulation 30 of LODR read with Schedule III shall be displayed on the website of the Company for a period of 5 (five) years.
2. Mandatory Hosting Period. The aforesaid information which is more than 5 (five) years old will be archived from the website of the Company and shall be maintained by the Company for a further Archival period of 3 (Three) years using appropriate technology.
3. Every function / unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this Policy.
4. Every function/ unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.

9. DISPOSAL OF DOCUMENTS AND RECORDS:

The documents and records which are no longer required or upon the expiration of the specified period of time for preservation may be destroyed or purged in the ways as may be decided from time to time, without the prior written approval of any one of the key managerial personnel of the Company appointed under the Companies Act, 2013 or as procedure specified by law.

10. REVIEW & AMENDMENT:

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant regulation and remains effective. The Board of Directors has the right to alter, modify, add, delete or amend any of the provisions of this policy at its discretion and the new policy shall be displayed to the stakeholders.

11. GENERAL:

This policy adopted by the Board at their Meeting held on 04th September 2024.

This policy is adopted based on the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time and other existing provisions, laws, rules and regulations.

Any change in regulatory provisions, rules, and regulations from time to time, the amended provisions shall prevail upon the corresponding provision of this policy from the effective date of such changes in the provisions.