

ASIAN HOTELS (NORTH) LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS (Adopted by the Board in its meeting held on 11th February, 2016)

PREAMBLE

The Board of Directors of Asian Hotels (North) Limited (the "Company") has adopted the following policy with regard to preservation of its documents which shall be called the "Policy for Preservation of Documents" (the "Policy"), in accordance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Listing Regulations").

PURPOSE OF THE POLICY

The purpose of the Policy is to specify the type of document(s) and the time period for preservation thereof based on the classification as provided under Regulation 9 of the Listing Regulations.

For the purpose of this Policy, 'document' shall include the following:

- 'book and paper' as defined in Section 2(12) of the Companies Act, 2013
- 'books of account' as defined in Section 2(13) of the Companies Act, 2013
- 'document' as defined in Section 2(36) of the Companies Act, 2013

EFFECTIVE DATE

The Policy shall come into effect from the date of its approval by the Board of Directors of the Company.

TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The Company shall maintain and preserve documents as specified here-under:

- i. The documents of permanent nature, as enumerated in **Annexure A** along with modifications, amendments, addition, deletion or changes made thereto from time to time shall be maintained and preserved permanently by the Company.
- ii. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions, as enumerated in **Annexure B** along with modifications, amendments, addition, deletion or changes made thereto from time to time

shall be maintained and preserved by the Company for a term of not less than eight years after completion of the relevant transactions.

- iii. Where there is a period for which a document is required to be preserved as per the applicable law, then, such document shall be preserved for the said period as required under the applicable law.

ROLES AND RESPONSIBILITIES

The concerned Department Heads will be responsible for the maintenance, preservation and destruction of documents pertaining to their respective department.

However, the concerned Department Heads shall ensure that the documents of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi judicial fora and other mediation and alternate dispute fora, industrial disputes, etc. are preserved according to the specific needs even beyond the prescribed period.

MODE OF PRESERVATION

The documents may be preserved either in physical form or in electronic form. However, the documents preserved in physical form may be converted, whenever required or felt necessary, into electronic form or vice-a-versa to ensure ease in maintenance of documents and efficient utilization of space.

The preservation of documents should be such so as to ensure that there is no tampering, alteration, destruction etc. which endangers the content, authenticity, utility or accessibility of the documents. The preserved documents must be accessible at all reasonable times. However, access may be controlled by the concerned Department Head, so as to ensure integrity of the documents and prohibit unauthorized access.

PRESERVATION LOCATION

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department.

All such documents which are statutorily required to be kept at the registered office of the Company shall always be kept thereat unless otherwise authorized, following due process under the relevant statute.

DISPOSAL AND DESTRUCTION OF DOCUMENTS

After the expiry of the preservation period, the concerned Department Heads shall prepare a list of documents which are required to be destroyed and have it placed before the Board, whereupon such documents shall be destroyed under the supervision of the concerned Department Heads.

The Company shall maintain a 'Register for Disposal of Records' wherein it shall enter brief particulars of the documents destroyed, the date and mode of destruction of such documents and all entries made therein shall be authenticated by the concerned Department Heads.

ADMINISTRATION AND REVIEW OF THE POLICY

The Board of Directors shall be responsible for the interpretation, application, administration and review of this Policy.

AMENDMENTS

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. Any amendment to the Policy shall take effect from the date when it is approved by the Board of Directors of the Company.

COMMUNICATION AND DISSEMINATION OF THE POLICY

A copy of the Policy duly approved by the Board of Directors of the Company shall be circulated amongst all the Directors of the Company and also to the Human Resource Department of the Company. The Human Resource Department shall then notify and communicate the existence and contents of this Policy to all the employees / Department Heads. The new employees shall also be informed about the Policy by the Human Resource Department.

The Policy shall also be hosted on the website of the Company.

ANNEXURE A

Certificate of Incorporation
Certificate for Commencement of Business
Memorandum of Association and Articles of Association as originally filed and updated from time to time
Agreements made by the Company with Stock Exchanges, Depositories etc.
Minute Books of General Meetings, Board Meetings and Committee Meetings thereof
Authorization / Licenses / Certificates obtained from any statutory authority
Policies of the Company framed under various legislations
Statutory Registers required under applicable laws
Attendance Registers for meetings of the Board and Committees thereof
Register for Disposal of Records
Statutory documents such as licenses, certificates, sanctions, approvals etc. from Government / Statutory Bodies
Such other documents as may be required to be maintained / preserved under any law from time to time

ANNEXURE B

Annual Returns along-with certificates and documents annexed thereto
Office copies of Notices, Agenda papers for meetings of the Board and Committees thereof along-with Notes on Agenda and other related / supporting documents
Office copies of Notice of General Meetings and other related / supporting documents
Office copies of newspaper advertisements and publications
Annual financial statements including annual accounts, directors' report, auditors' report
Instruments creating / modifying / satisfying the charge
Books of Accounts, Ledgers and Vouchers
Income Tax Returns filed under Income Tax Act, 1961, for eight years after final assessment
All consents, notices, disclosures including notices of disclosure of interest in Form MBP-1, received from the directors and KMPs along with any amendment thereto
Documents relating to Court cases / CBI cases / Police cases / Civil Suits / Labour Court Cases / Arbitration cases etc.
Disclosures received by the Company under the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
Compliance Reports received / filed with various statutory authorities
Correspondences made with any statutory authority
Non Statutory Registers / Documents
Forms and returns filed with MCA / RBI or with any other statutory authority
Scrutinizer's Report, Register of Postal Ballot, Postal Ballot forms, office copies of the notices, other related documents
Certificates received from Secretarial Auditors
Annual Reports
Where there is no specific preservation period for a document and / or no other preservation requirement as per applicable law, then, such document shall be preserved in good order for a term not less than eight years after completion of the relevant transactions
Such other documents as may be required to be maintained / preserved under any law from time to time