

**VICEROY HOTELS LIMITED**

**ARCHIVAL POLICY**

## **POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS IN THE WEBSITE**

*[Under Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]*

### **1. INTRODUCTION**

The Securities and Exchange Board of India (SEBI) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations, 2015”) which shall be applicable to all listed entity with effect from December 01, 2015.

**Regulation 9 and 30(8) of the Listing Regulations, 2015 is re-produced as under: Disclosure of events or information**

The listed entity shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

### **2. OBJECTIVE**

The objective of this policy is to prescribe a policy for archival of disclosures of events or information which has been disclosed to the stock exchange(s) under Regulation 9 and 30(8) of the Listing Regulations, 2015 and hosted on the website of the Company.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guide lines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

### **3. APPLICABILITY AND EFFECTIVE DATE**

This Policy shall be applicable to the Company with effect from 20<sup>th</sup> October, 2023.

### **4. DEFINITIONS:**

“**Act**” shall mean the Companies Act, 2013 and the rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

“**Board of Directors**” or “**the Board**” means the Board of Directors of Viceroy Hotels Limited, as constituted from time to time.

“**Listing Regulations**” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Policy**” means the Archival Policy of the Company.

“**Material Events**” means events as specified in Schedule III to the Listing Regulations from time to time upon occurrence of which the Company shall make disclosures to stock exchange as per the ‘Policy for Determination of Materiality of Event/Information’ of the Company.

“**Stock Exchange**” means the any exchange where shares of the Company are admitted for listing.

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

**5. ARCHIVING OF DOCUMENTS WHICH ARE HOSTED ON COMPANY'S WEBSITE:**

- A. All Documents generated, disclosed by the Company, on its website, for the purpose of shareholder communication, are the properties of the Company including archival material.
- B. Archival material of the Company shall not be destroyed or purged without the approval of the head of the department to which such archival material belongs.

Provided that nothing contained herein shall be deemed to lead to an exception except in case of an accidental deletion, or deletion due to any system flaw, virus, or any other deletion, inaccessibility or loss due to any reason other than deliberate and determinate deletion.

- C. Archival material so selected for preservation shall be sent to the Company archives in consultation with the head of concerned department, which thereafter may be removed as per the schedule provided herein.

**6. ARCHIVAL REQUIREMENT/WEB ARCHIVAL POLICY:**

- (1) The disclosures made to stock exchange under Regulation 9 and 30(8) would be uploaded on the website of the Company.
- (2) The disclosure of material events shall be hosted on the Company's website for a minimum period of 5 (five) years from the date of posting.
- (3) At the end of the fifth year the information shall be archived and preserved for a further period of three (3) years.
- (4) Thereafter, the information would be archived under the heading "Past Events/ Information" and would be retained on the website for a period of 1 (One) year.

**7. PROCEDURE:**

The Company Secretary of the Company shall arrange for uploading on the website of the Company all the disclosures made by the Company in pursuance to the Regulation 9 and 30(8) of the Listing regulations as soon as possible.

All such events or information so disclosed on the website of the Company in pursuance to Regulation 9 and 30(8) of the Listing Regulations, 2015 shall be archived after the expiry of the five years from the date of such posting and moved to the location or place under - "Historic Material Events/ Information".

The events/ information so archived under "Historic Material Events/ Information" shall be preserved for a further period of three years or till the time such events or information are resolved or closed, whichever is later.

In addition to maintaining the records on the website, the Company shall also maintain the physical copies of such disclosure made to the stock exchanges(s) which shall be preserved for the period as per the Company's Policy on Preservation of Documents.

**8. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED /RETAINED**

The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:

- A. Documents whose preservation shall be permanent in nature;
- B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions;
- C. Documents whose preservation shall be for a minimum period of three years after completion of the event.

The details of documents for the above three categories are given in the **Annexure**.

**9. PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS**

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

**10. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS**

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

**11. AMENDMENT AND REVIEW OF THE POLICY:**

In case of there are any regulatory changes requiring modifications to the policy, the same shall be reviewed and amended with the approval of the Board of Directors/ Managing Director/Chief Executive Officer. However, the amendment in the regulatory requirements shall be binding even if not incorporated in this Policy.

**12. STATUTORY REQUIREMENTS**

If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

**13. DISCLOSURES**

Archival Policy shall be disclosed on the website of the Company i.e. <https://www.viceroyhotels.in/>