



## **EMBASSY DEVELOPMENTS LIMITED**

*(formerly Equinox India Developments Limited, and earlier Indiabulls Real Estate Limited)*

(CIN: L45101HR2006PLC095409)

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## **POLICY ON PRESERVATION OF DOCUMENTS**

**(Policy last reviewed and amended on August 14, 2024)**

### **SCOPE AND PURPOSE**

The Securities Exchange Board of India (SEBI) on September 2, 2015, has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations, 2015).

Regulation 9 requires the Company to frame and adopt a policy on preservation of documents.

Accordingly, this Policy on Preservation of Documents has been approved and adopted by the Board of Directors of the Company at its meeting held on October 21, 2015 and shall be effective from December 1, 2015, to ensure compliance with SEBI regulations as applicable to the Company from time to time.

The provisions of the Policy shall be applicable to all subsidiaries of the Company.

### **DEFINITIONS**

#### **A. “Board of Directors” or “Board”**

Board of Directors or Board shall mean the Board of Directors of Embassy Developments Limited, as constituted from time to time.

#### **B. “Company”**

Company shall mean “Embassy Developments Limited”.

#### **C. “Documents”**

Documents shall mean all papers, records, files, books, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

## **D. “Listing Regulations”**

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

### **OBJECTIVE**

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A. The documents of permanent nature (as per **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (as per **Annexure-2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

## **ROLES & RESPONSIBILITIES**

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy as mentioned in SEBI regulations as well as Companies Act.

## **GENERAL**

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

## **DESTRUCTION OF DOCUMENTS**

After the expiry of the statutory retention period, the preserved documents may be destroyed in

such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents/records. Destruction of documents can be undertaken periodically with the approval of HOD of the department concerned. A list of document and date of destruction of such destructed documents have to be maintained in the department.

## **COMMUNICATION AND DISSEMINATION OF THE POLICY**

A copy of this policy shall be posted on the website of the Company.

## **AMENDMENTS**

The Board or the Management Committee may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy with a new policy. However, any such amendment or modification shall not be inconsistent with the applicable provisions of any law for the time being in force.

(Continued for Annexures 1 & 2)

## **Annexure - 1**

### **Documents whose preservation shall be permanent in nature**

<b>S. No.</b>	<b>Nature of Document(s)</b>
01	Registration Certificates
02	Licenses & Statutory Approvals
03	Statutory Registers required under applicable laws
04	Audited financial statements
05	Minutes of General Meeting
06	Minutes of Board Meeting
07	Minutes of various Committee Meetings
08	Material Agreements/Contracts
09	Orders issued by Courts/Statutory bodies
10	Investment Documents/proofs including certificates etc.
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

## Annexure - 2

**Documents with preservation period of not less than eight years after completion of the relevant transactions**

S. No.	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s)
03	Personnel Documents
04	Insurance Policies/ Claims under various policies
05	Correspondences with the Regulators
06	Non-Statutory Registers/Documents
07	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.