

JAMES HOTELS LIMITED

POLICY ON PRESERVATION OF RECORDS AND ARCHIVAL POLICY

1. PREAMBLE :

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "SEBI (LODR) Regulations" or "Regulations") requires every Listed Company to have a policy on Preservation of Documents/ records maintained by the Company either in Physical mode or Electronic mode.

Further, Regulation 30(8) of the Listing Regulations requires the Company to frame the archival policy for website disclosures.

2. SCOPE:

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements and also deal with archival policy for website disclosures.

3. OBJECTIVES OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of value are discarded after following the due process for discarding the same.

The major objectives of the policy are :

- Identification of Statutory Registers and other records of the Company which are required to be preserved.
- Identification and categorization of the Statutory registers and other records to be maintained either for eight years or permanently.
- Decide whether the Statutory Records and documents are to be preserved in physical form or in electronic form.
- After completion of 8 years, for the Statutory records and documents which are to be preserved for 8 years only may be dispensed of as per the guidelines of the policy or as decided by the Board of Directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.
- Have a proper and regulatory compliant archival policy for website disclosures.

4. DEFINITIONS:

- a. "Act" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;
- b. "Regulations" means Securities and Exchange Board of India (Listing obligations and Disclosure Requirements) regulations, 2015 and any amendments thereto;

- c. "Company", "This Company", "The Company", "Company" wherever occur in the policy shall mean "James Hotels Limited";
- d. "Current" means running matter or whatever is at present in course of passage;
- e. "Board of Director" or "Board", means the collective body of the Directors of the Company;
- f. "Policy" or "This Policy" means, "Policy on Preservation of Documents";
- g. "Maintenance" means keeping documents, either physically or in Electronic Form;
- h. "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed;
- i. "Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

5. INTERPRETATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. GUIDELINES

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them into at least two categories as follows :

- a. Documents whose preservation shall be permanent in nature;
- b. Documents with preservation period of not less than 8 years after completion of the relevant transactions.

Accordingly, the Company has classified the preservation of documents to be done in the following manner :

- a. Documents that needs to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI(LODR) Regulations;
- c. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

An indicative list of documents and the time frame of their preservation is provided in Annexure - 1.

7. MODES OF PRESERVATION

The Documents may be preserved in

- a) Physical form; or
- b) Electronic form.

