

Ashiana Housing Limited: Policy for Preservation of Documents

1. Preamble

As per Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall frame a policy for Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode which shall be duly approved by its Board of directors.

The Policy is aimed at providing guidelines to the management of the Company for maintenance and preservation of documents as per applicable statutory and regulatory requirements. The Policy shall come into effect from the date of its adoption by the Board of Directors of the company.

2. Objective

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 would contain guidelines to identify documents that need to be maintained, to ascertain 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. The following aspects are considered while arriving at the preservation period:

- a) to meet the information retrieval requirement of the company.
- b) to ensure authenticity, utility, and easy retrieval of documents/ records.
- c) to ensure non tampering, alteration, destruction of documents/ records.
- d) to meet the statutory and regulatory requirements under respective statutes.

3. 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 “Board”: means the Board of Directors of Ashiana Housing Limited (the Company).

“Document and Records”: means and includes written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company. Records means and includes matter in written, electronic, photographic, audio-visual, or stored in any other form that serves as an official record of the Company.

“Electronic Form”: With reference to information means any electronic device such as computer, laptop, compact disc, floppy disc, space, or 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.

“Regulations”: Means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars, or re-enactment thereof. Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Listing Regulations or any other applicable law or regulation to the extent applicable to the Company.

4. Guidelines for classification of documents and their preservation

Following are the guidelines for classification and preservation of documents:

- i. Documents and Records which are required to be preserved by under the applicable laws and regulations. These Documents and Records shall be preserved either permanently or for such periods as may be mandated by applicable laws from time to time.
- ii. Documents and Records which are required to be preserved for a period of not less than eight years after completion of the relevant transactions. Preservation of these Documents and Records shall be determined by the relevant Head of Departments of the Company from time to time.
- iii. Documents and Records that need to be preserved and retained for such period as prescribed by the company. These Documents and Records shall be preserved as per the standard operating procedures laid down by the Company which is applicable to the respective departments

5. Responsibility:

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

7. Destruction of documents/records:

The documents of the company which are no longer required in terms of this policy may be discarded or disposed-off in accordance with procedure specified by law in this behalf, and where no such procedure is specified, then in accordance with the standard operating procedures applicable to the respective departments.

8. Amendments:

The Policy may be amended, altered, substituted, or modified by the Board of Directors from time to time.

9. Scope and Limitation:

In the event of any conflict between the provisions of this Policy and the Act or Listing Regulations or any other statutory enactments or rules, the provisions of Listing Regulations / Act or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.