

POLICY ON PRESERVATION OF DOCUMENTS

॥आपो हि ष्ठा मयोभुवस्था न ऊर्जे दधातन । महे रणाथ चक्षसे॥

The above stanza is signifying the importance of river in our life and the way we give respect to river and preserve, nurture and value the water. Like the preservation of water is gist for flora and fauna, the preservation of documents and information is pivotal aspect of any company and on the same underlying, the company has this policy of preservation of documents.

I. MANDATE

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”) has made it mandatory for every Listed Company to form and adopt a policy on Preservation of Documents being approved by the Board of Directors of the company.

Apropos of the above, the following policy has been formulated and adopted by the Board of Directors (“Board”) of Kamat Hotels India Limited (“KHIL”/ “Company”) & adopted the policy on preservation of documents with the prime motive of classifying different records and registers for the purpose of maintenance and preserving the same over the period of the time as required by the law and this policy.

II. DOCUMENT PRESERVATION

The company shall preserve all its documents as per the legal mandate and provisions of the Companies Act, 2013 and the rules made thereunder, read with the Secretarial Standards, SEBI (LODR) Regulation, 2015 and any other law, rules, regulations for the time being in vogue.

Permanent preservation of documents:

The company shall maintain the following documents on eternal basis:

- a. The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company*
- b. Minutes of General Meetings, Board Meetings and various Committee Meetings*
- c. Register of Members along with Index*
- d. Foreign Register of Members, if any*
- e. Register of loans, guarantee, security and acquisition made by the company*
- f. Register of investments not held in its own name by the company, if any*
- g. Register of contracts with related party and contracts and Bodies etc. in which directors are interested*
- h. Register of Charges*
- i. Registers of Renewed and duplicate share certificates*
- j. Register of directors and KMP*

KAMAT HOTELS (INDIA) LIMITED
CIN: L55101MH1986PLC039307,
Regd. Office: 70-C, Nehru Road, Near Santacruz Airport, Vile Parle (East),
Mumbai -400 099.
Tel. No. 022-26164000, Website: www.khil.com, Email: cs@khil.com

Preservation of documents for at least eight financial years:

- a. Books of account together with the vouchers relevant to any entry in such books of account*
- b. Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company*
- c. Copies of all Annual Returns*
- d. Disclosure of Interest received from the Directors of the Company in the manner prescribed*
- e. Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings*
- f. Instrument creating a Charge or modifying a Charge, if any*
- g. Changes to the Memorandum of Association and the Articles of Association, if any*
- h. Register of deposits accepted or renewed, if any*

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The documents maintained for eight financial years may be destroyed after the expiration of eight financial years, unless there are any litigations/ assessments pending and may be considered necessary for preservation for a longer period.

III. OTHER GIST

IV. Manner of maintaining

All the records shall be preserved and maintained as per the legally specified and stipulated formats as amended from time-to-time under the various rules and regulations and statutory provisions.

Mode of Maintaining

The company chooses to maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to and complied with.

Application of Policy to certain other companies under the flagship

Minutes of all meetings, office copies of Notices, Agenda, Notes on Agenda and other related papers of the transferor company shall be preserved in good order in either mode mentioned above. They shall be maintained and preserved as per the time period applicable to them respectively and will be destroyed as per the method mentioned herein below or with the approval of the Board wherever needed.

V. DISPOSAL AND DESTRUCTION OF DOCUMENTS

The Company shall adhere to the requirements prescribed by any law and follow the procedure laid down by the Internal Audit Department of the company if any physical documents are to be destroyed. The records maintained under this Policy can be destroyed in one of the following ways:

- a. *Recycle non-confidential paper records;*
- b. *Burn / Shred or otherwise render unreadable confidential paper records; or*
- c. *Delete or destroy electronically stored data.*

VI. REPEALING & MODIFICATION OF THE POLICY

This Policy is framed based on the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as notified on September 2, 2015. In case of any further amendments to the Regulations which make any of the provisions in the Policy contradictory, the provisions of the Regulations shall prevail. The policy may be updated/amended from time to time by persons authorised by the Board.