

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

[Pursuant to Regulation 9 of Chapter III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities. In terms of Regulation 9 of Listing Regulations, 2015, the Board of Directors of HB Estate Developers Limited has adopted this “Policy on Preservation of Documents” at its meeting held on 10th February, 2016, as required under applicable regulations and shall be effective from 90 days from the date of notification of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

POLICY OBJECTIVE

To determine managing, storing and preservation of records/ documents based of the Company based on their statutory requirements.

2. DEFINITIONS

A. “Board of Directors” or “Board”

Board of Directors or Board shall mean the Board of Directors of HB Estate Developers Limited, as constituted from time to time.

B. “Company”

Company shall mean “**HB Estate Developers Limited**”.

C. “Documents”

Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, 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”).

3. POLICY

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 a permanent nature (listed in **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 (listed in **Annexure-2**) 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.

4. 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.

5. 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.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed upon review by the respective departments 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.

7. AMENDMENTS

The Board 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 entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

8. GENERAL AUTHORISATION

The Policy shall be subject to review, if necessary. Any change/ amendments in applicable statutes with regard to maintenance and preservations of documents shall be deemed to be covered under this policy without any review. Any change/ amendment to this policy shall be approved by the Chairman and / or the Company Secretary of the Company. This Policy will be communicated to all employees and other concerned persons of the Company in order to comply with the obligation of preserving the documents. The said policy shall also be posted on the website of the Company.

Documents whose preservation shall be permanent in nature

S.No	Nature of Document(s)
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 applicable

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 Departments/shareholders
06	Non-Statutory Registers/Documents
07	Films, Videos, CDs, DVDs, tapes etc.
08	Any other document as may be required to maintain in terms of applicable Law(s) maintained and preserved from time to time.

POLICY FOR ARCHIVAL OF DOCUMENTS

1. OBJECTIVE

The Board of Directors of HB Estate Developers Limited (the "Company") has adopted this policy (the, "Policy") for the archival of documents of the Company in accordance with, and to comply with the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations'). This Policy shall be effective from 1st December, 2015.

2. DEFINITIONS

All the words and expressions used in this Policy, unless defined herein, shall have meaning assigned to them in the Companies Act, 2013, rules made thereunder, Listing Regulations and other applicable statutory enactments (collectively, the 'Statutory Provisions'), as the case may be, as amended, from time to time.

3. ARCHIVING OF DOCUMENTS HOSTED ON THE COMPANY'S WEBSITE

The information disclosed by the Company under Regulation 30 of SEBI (LODR) Regulations, 2015, to the stock exchanges where the securities of the Company are listed, shall be disclosed on the website of the Company i.e. www.hbestate.com and shall be hosted on the Website for a period of five (5) years and thereafter in the archives of the Company for a period of one year.

4. DISCLOSURE

This Policy shall be disclosed on the Website.

5. INTERPRETATION

In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.

6.0 REVIEW

This Policy shall be reviewed periodically and may be amended by the Board, as may be deemed necessary.