

Preservation of documents and Archival Policy

BACKGROUND:

As per Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, every listed company is required to have a policy for preservation of documents approved by its Board of Directors, classifying them as documents whose preservation shall be permanent in nature and documents with preservation period of not less than 8 (Eight) years after completion of relevant transactions. Accordingly, the Board of Directors of the Company has approved Preservation of documents and Archival Policy ("the Policy") for preservation of documents/ records maintained by the Company either in physical mode or electronic mode. Also the Board is authorized to modify this policy as may be required from time to time, in view of the amendments in the regulatory requirements.

PURPOSE OF THE POLICY:

The purpose of this policy is to lay down a framework for effective management of the records at the Company and to ensure the preservation and protection of the records as per the statutory requirements. This policy is also meant to set principles underlying the Company's approach to preservation of its records and to define the obligation of the employees in retaining and preserving the records which are required to be maintained as per the applicable statutory and regulatory requirements.

PRESERVATION OF DOCUMENTS:

In accordance with Regulation 9 of the Listing Regulations, documents which the Company is required to preserve under the Applicable Laws, shall be classified under the following categories and shall also be preserved as mentioned against each category: -

- a. Documents whose preservation shall be permanent in nature: Documents, which are required to be preserved permanently, by the Company as per Applicable Laws, shall be preserved permanently, in accordance with the provisions of the Applicable Laws.
- b. Documents, which are required to be preserved by the Company for not less than eight years as per Applicable Laws, shall be preserved for eight years for the relevant date or after completion of the relevant transactions, in accordance with the provisions of the Applicable Laws.
- c. Documents, which are required to be preserved by the Company for less than eight years as per Applicable Laws, shall be preserved for such period as may be prescribed in accordance with the provisions of the Applicable Laws.
- d. Documents pertaining to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter, where there is no such requirement as per Applicable Laws, then such documents shall be preserved for such period till the subject matter is closed/completed/settled as the case may be or otherwise.
- e. Documents like License, Registration, and Permission etc shall be preserved permanently, unless the relevant activities/matter is closed and no longer required in future.

- f. Documents like Deed/Agreements /Ownership right etc in relation to Immovable properties shall be permanently preserved unless such Immovable Properties is no longer properties of the Company.

MANNER OF PRESERVATION:

Documents may be preserved in physical or electronic mode as may be permitted by law. All the possible measures must be taken to ensure the data is secure and safe as the case may be. The Company must take possible/ feasible steps so as to prevent the documents from being damaged / mutilated/ altered/ destroyed. If the documents are in electronic mode, necessary care must be taken to avoid corruption of files and also should have proper back-up of electronic records.

The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

The Officer of the Company, who is authorised to observe the compliance of requirement of respective Applicable Laws and rules, regulation thereunder etc. as the case may be, shall be responsible for the preservation of the Documents in accordance with this policy.

ARCHIVAL OF INFORMATION:

In accordance with the provisions of the Listing Regulation, all such events / information disclosed to the stock exchanges which are made available on the website of the Company for a minimum period of five 5 years, shall be archived for a further period of 1 year in the manner as may be deemed appropriate to the Company. The Policy shall be disclosed on the Company's website www.tatarealty.in, in order to inform stakeholders to facilitate them to retrieve past information which is out of statutory nature for the period disclosed in Policy.

GENERAL:

In case any subsequent changes in provision of Listing Regulations or any other regulations which make any of the clause/provision in this Policy inconsistent with the Listing Regulations, the provisions of Listing Regulations shall prevail over the Policy.

REVIEW:

The Company shall review and revise the Policy as and when deemed necessary.

In the event of any conflict between the provision of this Policy and the applicable laws, the provisions of the applicable laws shall prevail over this Policy. In case of any subsequent changes in the applicable law, the relevant amended provisions would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with the law. This Policy will be reviewed by the Board as and when deemed appropriate and to comply with any regulatory requirements.

VERSION HISTORY

Version	Approved by	Approval Date	Effective Date	Section Modified
00	Board	26-Nov-2019	26-Nov-2019	Adoption
01	Board	31-Jan-2025	31-Jan-2025	All