EXCEL REALTY N INFRA LIMITED (formerly known as Excel Infoways Limited)

PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

[Pursuant to Regulation 30(8) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regualtions, 2015]

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1. Background

As per Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015 (hereinafter referred to as SEBI Listing Regulations), every listed entity is required to make disclosures of any event or information which in the opinion of the board of directors of the listed company is material and such disclosures shall be hosted on the website of the listed company for a minimum period of 5 years thereafter as per the archival policy of the Company as disclosed on its website.

2. Purpose and Scope:

The purpose of this document is to present a policy statement for the Company regarding preservation of the documents and archival documents in the website in accordance with the provisions of the Companies Act, 2013 and Regulation 9 and Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR")

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention of documents received or created in the course of the business. This policy gives guidelines on how to identify documents that needs to be maintained, 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.

3. **Definitions**

- (a) Archive: A Collection of historical documents and records providing information accumulated over the course of an organization's lifetime. It can also be termed as 'Corporate Memory'
- (b) Archives : It is referred to a repository where the records are kept
- (c) Archivist : Archivist is a person who on timely basis reviews the records and decides upon the requirement of hosting information on the web portal of the Company

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- (d) Electronic records: Records communicated and maintained by means of electronic equipment's.
- (e) **Records:** A "record" is a database of disclosed information or events in any format or medium that has been created by or for the Company, or received by the Company in connection with the transaction of the organization's affairs and operations.

4. <u>Policy</u>

Taking into account the aforesaid provisions and other applicable legal provisions, the policy on archival of disclosures made to the stock exchanges is being made as under:

- 1. All disclosures made under Regulation 30 of the SEBI Listing Regulations by the Company to the stock exchanges, where the shares of the Company are listed, shall be kept on the website of the Company for a period of 5 years and hereafter in the archives of the Company for 2 years
- 2. The Chairman is authorized to make appropriate changes to the above policy as he may deem expedient taking into account the law for the time being in force
- 3. The policy shall be placed on the Company's website
- 4. The policy is subject to review from time to time.