

ECO HOTELS AND RESORTS LIMITED
(formerly known as Sharad Fibres and Yarn Processors Limited)

Preservation of Documents and Archival policy

1. PREAMBLE

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR Regulations), Eco Hotels and Resorts Limited (the Company) is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations in at least two categories as follows-

- (a) documents whose preservation shall be permanent in nature ;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions.

In terms of Regulation 30(8) of the Listing Regulations, the Company is required to disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website.

2. OBJECTIVE

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under the LODR Regulations, in terms of Regulation 9 and also to archive any of the documents of material events or information which are disclosed by the Company to the Stock Exchanges for the period of five years in terms of Regulation 30.

3. DEFINITIONS

“Company” means “Eco Hotels and Resorts Limited”.

“Documents” refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

“Electronic Records” means the Electronic records as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

“Electronic Form” means on any electronic device such as computer, laptop, compact disc, floppy disc, space on 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.

“Maintenance” means keeping documents, either physically or in electronic form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

Unless the context otherwise requires, words and expressions used and defined in this policy and/or used and not defined herein but defined in the Companies Act, 2013 , the SEBI (Listing Obligations and Disclosure Requirement) Regulations ,2015 and Information Technology Act, 2000 or other application law as may be amended from time to time, to the extent relevant in connection with this Policy, shall have the meaning respectively assigned to them therein.

4. EFFECTIVE DATE OF THE POLICY

The Board of Directors of the Company have, at their Meeting held on August 29, 2023 decided to revise the existing Policy to incorporate the requirements of the Act and the LODR regulations. This Policy will supersede the provisions of the earlier Policy adopted by the Board of Directors.

5. POLICY FOR PRESERVATION OF DOCUMENTS

Documents and Records of the Company required to be maintained under the LODR Regulations shall be classified in two categories as below:

- Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;
- Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions the subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that the Company may keep the documents as specified above in an electronic mode.

I. DOCUMENTS TO BE PRESERVED PERMANENTLY

A. Companies Act, 2013:

1. Memorandum and Articles of Association as amended from time to time
2. Register of Contracts
3. Register of Directors and KMPs and the securities held by them
4. Register of Loans and Investments made by the Company
5. Register and Index of Members
6. Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots
7. Resolutions passed by Circulation
8. Various Forms and returns filed with the Authorities
9. Audited Financial Statements.

B. SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

1. Listing Agreement executed with the Exchanges.
2. Trading approval relating to listing of securities.
3. Offer documents for Public Issues and Private placement of securities filed with Securities and Exchange Board of India.

C. Depositories Act:

1. Confirmation of all Corporate Actions in respect of allotment of securities.
2. Intimation on allotment of International Securities Identification Numbers (ISIN) for securities issued.

D. Others:

Register of Records and Documents destroyed.

II. Following documents shall be preserved and maintained for a period of 8 years from the date of its event, unless specified under any other any Act or rules, for a longer duration:

A. Companies Act 1956 / Companies Act, 2013:

1. Register of Buy-back of Securities from the date of completion of buy-back
2. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots
3. Register of Charges from the date of satisfaction of respective charge
4. Register of Debentures and Debenture Trust Deed from the date of its redemption
5. Books of Accounts including vouchers and bills
6. Annual Returns together with the Annexures
7. Register of Transfer and Transmission of shares / Debentures and other securities
8. Scrutinizer's Report on Postal Ballot and AGM
9. Documents relating to appointment of Managerial Personnel
10. Dividend reconciliation statement till the time the dividend is transferred to IEPF

B. SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

1. All reports filed with the stock exchanges from time to time
2. All disclosure of various events and Press Releases
3. Intimations of Board Meetings

C. Documents filed with Stock Exchanges under SEBI Regulations:

All disclosures and intimations filed under:

1. SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011
2. SEBI (Prohibition of Insider Trading) Regulations, 2015
3. All disclosures and intimations filed under SEBI (Share Based Employee Benefit) Regulation, 2014 and SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines 1999

6. ROLES & RESPONSIBILITIES

The respective Departmental Heads / Functional Heads shall be responsible for maintenance and preservation of documents in respect of areas of operations falling under the charge of each of them. However, destruction of documents requires approval from the board of directors.

7. DESTRUCTION OF DOCUMENTS

After the expiry of statutory retention period, the preserved documents may be destroyed in such mode and manner as may be approved by the Board of Directors of the Company.

8. ARCHIVAL POLICY

Any disclosure of events or information which has been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived under Archive section of the website of the Company.

9. ADOPTION/ DISCLOSURE/AMENDMENT & BOARD'S APPROVAL

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 the 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.

DISCLOSURE

This Policy shall be uploaded on the Company's website for investors and public information and a web link thereto shall be provided in the Board's Report as part of the Annual Report of the Company .