

GMR Hyderabad International Airport Limited



Document Preservation and Archival Policy



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1. **INTRODUCTION:**

GMR Hyderabad International Airport Limited is a company incorporated under the Companies Act, 1956, (the “Company”) engaged in operation, management and development of Rajiv Gandhi International Airport (RGIA), Hyderabad.

The records of the Company are the important assets for the Company, the Company endeavours to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy.

This policy shall be known as “Document Preservation and Archival Policy” (hereinafter referred to as “the Policy”).

2. **PURPOSE OF THE POLICY:**

The policy on preservation of documents is mandated by the provisions of Regulation 9 of Chapter III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) [hereinafter referred to as “SEBI (LODR) Regulations” or “Listing Regulations”].

Further, as per the Regulation 51 (3) of the, Listing Regulations, the Company shall disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under Regulation 51 of Listing Regulations 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.

This Policy categorizes the records whose preservation shall be permanent in nature and documents that will be preserved for specified period of time and outlines responsibilities to create, maintain and dispose of the records. It endorses the preservation of records in the Company’s Archives.

3. **DEFINITIONS:**

- i. “Company” means GMR Hyderabad International Airport Limited.
- ii. “Board” means the Board of Directors of the Company or its Committee.
- iii. “Documents” means as defined in sub-section 36 of section 2 of the Companies Act, 2013.
- iv. “Electronic Records” means as defined in Information Technology Act, 2000 or as amended from time.
- v. “Electronic Form” means as defined in Information Technology Act, 2000 or as amended from time.
- vi. “Preservation” / “Archival” means to keep in good order / storage and to prevent from being altered, damaged or destroyed.
- vii. “Policy” means this Policy for Preservation of Document(s) and archival of the Company.



- viii. “Records” in relation to this policy includes accounting records, “book and paper” and “book or paper” as defined in sub-section 12 of section 2, “books of accounts” as defined in sub-section 13 of section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Regulations or any other relevant regulation/ legislation applicable to the Company.

4. **OBJECTIVE OF POLICY:**

This Policy mechanism provides the comprehensive framework for preservation of documents and archival of documents on the website for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management.
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed.
- c) Systematic disposal/ destruction of Company’s non-current records that have outlived their administrative usefulness.
- d) Identification of the Company’s records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company’s Archives.

5. **APPLICABILITY:**

This policy is applicable to all documents maintained physically and in electronic mode by the Company.

The Documents that are not covered under this policy shall be preserved and maintained in accordance with provisions of the respective Acts / Rules / Regulations / Guideline s/ Notifications as applicable under which those documents are maintained.

6. **SCOPE OF THE POLICY:**

For the purpose of achieving the above objectives, the documents covered as per this Policy have been divided into two sections, i.e.:

- (i) the records or the documents that will be preserved permanently by the Company; and
- (ii) the records or the documents that will be preserved for the period of at least 8 years.

This Policy applies to the records maintained by the Company in any format or medium. The records which are not required to be retained permanently shall be disposed off according to this Policy.



7. **AUTHORITY AND RESPONSIBILITY FOR PRESERVATION OF DOCUMENTS & ARCHIVAL OF DOCUMENTS ON THE WEBSITE:**

Any officer as designated by the functional head of the Company in this behalf, shall be responsible for the preservation of the records according to the time frame prescribed in the Policy for their preservation.

All staff and management of the Company shall assist in implementing this Preservation Policy as appropriate to their roles and responsibilities.

8. **CLASSIFICATION OF RECORDS:**

Based on the requirement and for the purpose of effective management, the period for which the records of the Company shall be maintained have been classified into two categories:

- (i) Documents whose preservation shall be permanent in nature-Annexure 'A';
- (ii) Documents whose preservation shall be at least 8 years-Annexure 'B'; and
- (iii) The Company shall disclose on its website all events or information which has been disclosed to Stock Exchange(s) under Regulation 51(3) of Listing Regulation and retain the same for period of five years. At the end of five years, the information shall be archived and preserved for a further period of three years - Annexure 'C'.

The documents as specified in i & ii above may be kept in electronic mode also.

The classification of the documents has been made in Annexures which forms part of this Policy.

While prescribing different time period for preservation of records, the following aspects have been taken into account:

- a) Compliance with statutory and regulatory requirements.
- b) Satisfaction of the needs of Securities and Exchange Board of India (SEBI)/ Ministry of Corporate Affairs (MCA) to have access to certain records.
- c) Satisfaction of the needs of internal and external auditors to have access to certain records.

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulations by which they are governed.

9. **LOCATION OF DOCUMENTS/ RECORDS:**

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute shall be maintained at the registered office of the Company or at any other place as may be approved by the Board, from time to time.



10. **RECORD RETENTION SCHEDULE:**

The records referred to in Annexure A of this Policy shall be maintained permanently and the records which are required to be preserved permanently on the website of the Company shall be preserved in line with the statutory requirements.

Records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use, therefore disposal will aid efficiency.

The records referred in Annexure B shall be preserved for at least 8 years and thereafter as per the discretion of the functional heads records may be disposed off in the manner prescribed by it.

The Company shall maintain a register of preservation and disposal of records in the custody of such officer of the Company as the functional head may determine, wherein the brief particulars of the records preserved and/or removed from the location after the expiry of its preservation period shall be entered. The register of preservation and disposal of records shall contain the following columns:

- a) Item Number.
- b) Brief Particulars of the records preserved/ disposed off.
- c) Date of creation of the record.
- d) Date of removal from the register.
- e) Whether preserved permanently or not.
- f) Mode of destruction.
- g) Digitized / Electronic copy available

This register of preservation and disposal of records shall be maintained permanently by the Company either in physical or electronic form.

11. **RECORD APPRAISAL:**

The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process is to ensure the records are examined at the appropriate time to determine whether or not they are worthy of archival preservation, whether they need to be retained for a longer period as they are still in use, or whether they should be destroyed.

12. **REVIEW OF THE POLICY:**

This Policy may be amended with the approval of Board of Directors of the Company as may be deemed necessary and in accordance with any regulatory amendments.



Should there be any inconsistency between the terms of the Policy and the Listing Regulations, the provisions of the Listing Regulations shall prevail.

This Policy was originally reviewed and approved by the Board of Directors on 20-01-2023.

Sl. No.	Reviewed By	Review Date	Approved By	Approval Date
01.	Board of Directors	20-01-2023	Board of Directors	20-01-2023



ANNEXURE – A

Records to be preserved permanently:

Sl. No.	Documents/ Records
1	Certificate of Incorporation/ Commencement of Business.
2	Memorandum & Articles of Association (as amended from time to time).
3	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013.
4	License and Permissions.
5	Register of Members.
6	Index of Members.
7	Agreements made by the Company with Stock Exchange(s), Airports Authority of India, Shareholders, Private Participants, Depositories, etc.
8	Records relating to Court Cases/ CBI Cases/ Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases/ SAT.
9	Files relating to premises for instance Title Deeds/ Lease Deeds of owned premises / land and building, etc. and related Ledger/ Register.
10	Authorization/ licenses obtained from any statutory authority.
11	Policies of the Company framed under various regulations.
12	Register of preservation and disposal of records.
13	Register of Power of attorneys, if any.
14	Certificates obtained from various Statutory Authorities.
15	Books and Papers of Amalgamated Companies, if any.
16	Records & Register of Private Placement.
17	Register of Renewed and Duplicate Share Certificate.
18	Register of Sweat Equity Shares, if any.
19	Register of Transfer & Transmission, if any.
20	Register of Employee Stock Option, if any.
21	Register of Security Buy Back, if any.
22	Postal Ballot Resolution, if any.
23	Any other document as may be required to be maintained and preserved, permanently in terms of applicable law(s), from time to time.



ANNEXURE – B

Records to be preserved for minimum period of eight (8) years:

Sl. No.	Documents/ Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013.
2.	Register of Inter Corporate Loans and Investments as per Companies Act, 2013.
3.	Annual Returns as per Companies Act, 2013.
4.	Register of Deposits as per Companies Act, 2013.
5.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013.
6.	Annual financial statements including: - Annual accounts - Directors report - Auditors report
7.	Vouchers/ Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
8.	Income Tax Returns filed under Income Tax Act, 1961.
9.	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto.
10.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013.
11.	Inspection of Registers.
12.	Register of Investment made by the Company, not held in its name.
13.	Register of Contract or Arrangements in which Directors are interested.
14.	Copy of newspaper advertisement or publications.
15.	All agreement entered into by the Company from the date of its termination.
16.	All show cause notice or any other notice received from any statutory, Government Departments, Judicial or Quasi-judicial authority etc.
17.	Disclosures under SEBI Regulations.

**ANNEXURE – C**

Documents hosted on the Company's website and to be archived post completion of five years:

Sl. No.	Documents/ Records
1.	All such events or information which have been disclosed to the Stock Exchange(s) pursuant to Regulation 51 of Listing Regulations will be preserved on the website of the Company for a minimum period of five (5) years.
2.	Post completion of 5 years, Documents preserved on the Company's website as per Sl.No. 1 above will be archived and preserved for a further period of 3 years.