



**GMR AIRPORTS LIMITED
(FORMERLY GMR AIRPORTS INFRASTRUCTURE LIMITED)**

Policy on

Preservation

&

Archival of documents

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1. INTRODUCTION

- 1.1 The purpose of this document is to present a policy statement for GMR Airports Limited (formerly GMR Airports Infrastructure Limited) ('Company') regarding preservation and archival of documents in accordance with the provisions of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR").
- 1.2 The policy is framed for the purpose of systematic identification, categorization, maintenance, review, preservation and destruction of documents received or created in the course of business, in terms of various statutory provisions. The policy gives guidelines on how to identify documents that need 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.

2. PURPOSE OF THE POLICY

- 2.1 The policy on preservation of documents and archival is mandated under the provisions of Regulation 9 of Chapter III of SEBI LODR.

Under Chapter III of SEBI LODR, the Company has to ensure that significant documents are safeguarded and preserved including those in electronic mode.

3. DEFINITIONS

- 3.1 "Policy" means this Policy on Preservation and Archival of documents.
- 3.2 "Electronic Form" with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, microfilm, computer generated micro fiche or similar device.

4. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

- 4.1 The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:
- A. Documents whose preservation shall be permanent in nature (refer Annexure A);
 - B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions (refer Annexure B);
 - C. Documents with preservation period other than those mentioned above:

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in A & B above shall be preserved, for the respective periods mentioned under the said Act, rules, regulations and documents referred in Annexure C shall be preserved for a period of at least three years .

The documents as specified in A, B and C above may be kept in electronic mode also.

5. RESPONSIBILITY OF COMPANY OFFICIALS FOR PRESERVATION OF DOCUMENTS

5.1 The Company officials are responsible for taking into account the potential impact on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

6. Destruction of documents mentioned in Sub Clause (B) and (C) of Clause 4.1 of this Policy

Any of the documents mentioned in sub clause (B) and (C) of clause 4.1 of this policy, which are not required to be maintained and preserved permanently may be destroyed.

It is advisable that documents / records may not be kept longer than is necessary and may be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use. The documents / records referred to in Annexure B and Annexure C shall be preserved for at least 8 years and 3 years respectively (or additional period decided by the Company) and may be disposed of after the expiry of the periods of their preservation, after the approval of the concerned Function Head to which function the document relates and of Company Secretary of the Company.

The Company shall maintain a register of disposal of records in the custody of the Company Secretary of the Company, wherein the brief particulars of the records disposed of shall be entered.

The register of disposal of records shall contain the following columns:

Particulars of Document along with Provision of Law	Date And Mode of Destruction	Initials/ approval of the Function Head	Email of the

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

7. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

7.1 In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

8. STATUTORY REQUIREMENTS

8.1 If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

9. WEB ARCHIVAL POLICY

9.1 The Company shall disclose on its website all events or information which have been disclosed to Stock Exchange(s) and retain the same for period of five years.

9.2 At the end of five years, the information shall be archived and preserved for a further period of three years. Thereafter, such events or information may cease to be displayed on the website of the Company.

10. REVIEW AND AMENDMENT

10.1 This policy shall be subject to review by the Board of Directors as may be deemed necessary and to comply with any regulatory amendments or statutory modifications, preferably once every three years.

10.2 The Board of Directors may amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time.

10.3 In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down

under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail notwithstanding the provisions hereunder from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc. and shall be deemed to be part of this policy.

ANNEXURE

A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

1. Accounting and Finance records including Annual Financial statements and Audit Reports;
2. Investment records;
3. Tax records including annual returns;
4. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks;
5. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records;
6. Personal files of individual employees (Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc.);
7. Any other record as may be decided by any KMP (as per Companies Act, 2013) or the Managing Director or the Board of Directors of the Company from time to time;
8. Filings with Registrar of Companies;
9. A copy of Members Data including details of transactions in physical folios provided by RTA on quarterly basis;
10. A copy of Register of Debenture holders provided by RTA at the end of each quarter.

B. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:

1. Bank Statements and vouchers;
2. Filings with Stock Exchanges and other statutory authorities;
3. Corporate Social Responsibility Records;
4. Sponsorship Projects Records;
5. Correspondence and Internal Memoranda;
6. Any other record as may be decided by the Managing Director of the Company from time to time;
7. Security Deposit Receipts (after receipt of deposit money back);
8. Tender Documents;
9. Lease Deeds and Contracts;
10. Legal files;
11. Insurance Records including policies and claims;

12. All e-mail correspondence, internal & external;
13. Any other record as may be decided by the Managing Director and CEO of the Company from time to time;
14. Dividend/Interest/Redemption Master data file containing details for each dividend/interest/redemption paid by the Company;
15. Dividend/interest/redemption reconciliation data of the Paid and Unpaid dividend/interest/redemption details;
16. Reconciliation report on maintenance of stationery including blank certificates, dividend/interest/redemption warrants;
17. A list maintained by RTA of the folios for which enhanced due diligence is exercised;
18. A copy of report of the Internal Audit submitted by RTA;
19. A copy of Action Taken report, audit observations along with the corrective steps taken by the RTA.

C. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN THREE YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:

1. Proof of sending Notice of Board Meetings and Committee meetings and its delivery;
 2. Proof of sending Agenda and Notes on Agenda and their delivery;
 3. Proof of sending and delivery of the draft of the Resolution(s) and the necessary papers;
 4. Proof of sending draft Minutes of Board and Committee meetings and its delivery;
 5. Proof of sending signed Minutes of Board and Committee meetings and its delivery;
 6. Record of each recipient to whom the Notice of General Meeting(s) has been sent and copy of such record and any Notices of any failed transmissions and subsequent re-sending.
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