



## **Barbeque-Nation Hospitality Limited**

***(Registered Office: Sy. No. 62, Site No. 13, 6<sup>th</sup> Cross, NS Palya,  
BTM Layout, Bengaluru-560076, Karnataka, India)***

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***POLICY ON PRESERVATION OF DOCUMENTS /ARCHIVAL  
POLICY ON WEBSITE***

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## **POLICY ON PRESERVATION OF DOCUMENTS /ARCHIVAL POLICY ON WEBSITE**

### ***Base Document:***

- ***Regulation 9 of Chapter III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 on Preservation of documents***
- ***Regulation 30(8) Chapter IV of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 on Archival Policy of Documents on Company Website.***

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***# Policy On Preservation of Documents approved and adopted by the Board of Directors on 29<sup>th</sup> June 2017 and revised by the IPO Committee on 16<sup>th</sup> March 2021.***

### **1. PREFACE:**

The Securities and Exchange Board of India (SEBI), has notified SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Listing Regulations').

In terms of Regulation 9 of Chapter III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company is required to frame policy for preservation of documents. Further, in terms of Regulation 30(8) of Chapter IV of the SEBI LODR Regulation 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.

In compliance to the aforesaid Regulations, this Policy is formulated to define a process for preservation of documents and to further develop a guideline for archival of such documents, including those which are maintained in electronic form and are disclosed on the website of the Company.

The Policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. This Policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical records as per various statutory requirements and are subject to same degree of confidentiality and care.

## **2. Definitions:**

**“Act”** means the Companies Act, 2013 including any amendment or modification thereof.

**“Applicable Law”** means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of documents has been prescribed.

**“Authorized Person”** means any person duly authorized by the Board.

**“Archive”** is an accumulation of historical records or the physical place/electronic mode where they are located. Archives contain primary source documents that have accumulated over the course of an organization’s lifetime, and are kept to show the function of that organization.

**“Board of Directors”** or **“Board”** means Board of Directors of Barbeque-Nation Hospitality Limited.

**“Company”** means Barbeque-Nation Hospitality Limited inclusive of its registered office and all branch offices.

**“Current Documents”** means any document that still has an ongoing relevance with reference to an ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

**“Committee”** means committee of the Board of Directors or any other committee so constituted.

**“Compliance Officer”** means Company Secretary of the Company or the Officer appointed by the Board of Directors of the Company for the purpose of this Policy and regulation.

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

**“Evidence”** means information that tends to prove a fact.

**“Electronic Records”** means the electronic records as defined under clause Section 2(1)(t) of the Information Technology Act, 2000.

**“Electronic Form”** means any contemporaneous 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.

**“Financial Year”** shall have the same meaning as assigned under Section 2(41) of the Companies Act, 2013.

**“Listed Entity”** means an entity which has listed, on a recognized stock exchange(s), the designated securities issued by it or designated securities issued under scheme managed by it, in accordance with the listing agreement entered into between the entity and the recognized stock exchange(s).

**“Maintenance”** means keeping documents and records, either in physical or electronic form.

**“Preservation”** means maintenance of documents, files and documents in usable form.

All other words and expressions used are not defined in this policy or the regulation, but defined in the Companies Act, 2013, the Securities Contracts (Regulation) Act 1956, the Depositories Act, 1996 and/or rules and regulations made thereunder, shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

### **3. Coverage**

This Policy is intended to guide the Company and its Officers on maintenance of any document their preservation and disposal.

### **4. Classification of Documents**

- a. Documents shall be classified into the following categories:
  - a. Mandatory under Governing Laws
  - b. Non – Mandatory

- b. Documents which are required to be mandatorily preserved for stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with the Policy.
- c. All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
- d. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this Policy.

## **5. Manner of Preservation of Documents**

### **• Methodology of Preservation:**

The Company shall primarily utilize any one combination of the following methods in preserving the records:

- i. Department or Function-wise.
- ii. Subject or Topic-wise.
- iii. Chronologically.
- iv. Such other method as the departmental heads may consider appropriate, so as to fulfill the following objectives:
  - a. To meet the legal standards for protection, storage and retrieval.
  - b. To optimize the use of space and minimize the cost of record retention.

### **• Storage and Security Conditions:**

The records should be in conditions that are secure and clean with low risk of damages. Records of non-paper format shall require special storage conditions and handling process, after taking into account their specific character. Similarly, records of continuing value and requiring longer preservation shall require a higher quality of storage.

### **• Duration of Preservation:**

The minimum retention requirement of the different categories of the Company records is provided in the ***Retention Schedule*** as detailed in ***Annexure I*** to this policy.

### **• Custody of the Documents:**

Subject to the applicable laws, the custody of the documents shall be with the authorized person. Where the authorized person tenders resignation or is transferred from one location

of the Company to another, such person shall hand over all the relevant documents, lock and key, access control or password or Company Disc, Other Storage Devices or such other documents and devices in his possession under the policy. The Board may authorize such other person as it may deem fit as the authorized person.

#### **6. Accessibility and Confidentiality:**

Records shall be made accessible to all the concerned employees of the Company and other external users not belonging to the Company, with the permission of the Departmental heads. However, the Board of Directors of the Company, Chief Financial Officer and the Company Secretary shall have access to all the records maintained by the Company. Any record containing confidential data will be made accessible only after the permission of the Board of Directors of the Company, Chief Financial Officer or the Company Secretary.

#### **7. Manner of Public Disclosure of Records published on the website of the Company:**

The documents required to be published on the website of the Company shall be hosted under 'Investors Section – Investor Corner' of the website till the stipulated duration of time as provided under the various laws in force or for such longer time as the Board of Directors of the Company, Chief Financial Officer or the Company Secretary & Compliance Officer so desire.

Thereafter, the same shall be transferred to the 'Past Information/Events' section till such time as may be instructed by the Directors of the Company or the Company Secretary. However, in case of any updation in disclosure of such published record, the older record can be removed from the website of the Company as per the advice of Board of Directors of the Company, Chief Financial Officer or the Company Secretary, provided it does not lead to contravention of any law(s) or regulation(s) in force.

#### **8. Destruction of Records:**

Records which no longer serve a useful purpose should be destroyed. Record destruction can also improve operational efficiency by reducing the quality of records to be searched in order to locate the needed information. All confidential records shall be destroyed only after the approval of the Board of Directors of the Company, Chief Financial Officer or the Company Secretary.

The modes of destruction of records may include the following:

1	Confidential Papers	Confidential Papers shall be destroyed by making them unreadable.
2	Non-Confidential Papers	Non-Confidential Papers shall be sold to waste paper dealer or recycled.
3	Electronically Stored Records	Electronically stored records shall be erased or destroyed with the help of IT Department.
4	Destruction of magnetic media	Destruction of magnetic media records such as

	records such as floppy disks	floppy disks shall be destroyed by reformatting the same at least once.
5	Destruction of optical media records such as rewritable disks	Destruction of optical media records such as rewritable disks shall be destroyed by cutting, crushing or other physical means.

**9. Roles and Responsibility of various Departmental Heads:**

The departmental heads must be familiar with this Policy and educate their department in this regard. They must restrict access to confidential records and information. They must coordinate in the destruction of the records as and when required.

**10. Amendments and Modification in the Policy:**

The Board may, subject to 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 as it may deem necessary.

The Board may also establish further rules and procedures, from time to time, to give effect to this policy and to ensure governance.

**ANNEXURE I**  
**Document Retention Schedule**

<b>Sr. No</b>	<b>Record/Document Category</b>	<b>Record/Document Type</b>	<b>Minimum Retention Requirement</b>
1	Records related to Board/Committee Meeting	Agenda Papers, Internal Audit Report, Minutes of Meeting, Policies, Code of Conduct, Attendance Register, Disclosure of Directors Interest, Other Miscellaneous reports/records.	Permanent
2	Records related to General Meeting	Register/Index of Members, Minutes , Attendance Register	Permanent
3	Other Secretarial Records	Incorporation Certificate, Conversion /Commencement of Business Certificate, Memorandum of Association, Articles of Association, Common Seal, Annual Reports, Statutory Registers pursuant to the Companies Act, 1956/2013, Register for Transfer/Transmission of Shares maintained with Registrar and Share Transfer Agent, Correspondence with regulatory authorities, Correspondence with Shareholders, Copies of all Annual Returns.	Permanent
4	Records related to SEBI and Stock Exchange	Correspondence with Statutory bodies, Quarterly/Annually/Non-Quarterly /Other Compliances submitted from time to time, Newspaper publication, listing disclosure.	Permanent
5	Records related to Insurance	Insurance Policy Execution, Renewal Certificate, Insurance Claims under various policies.	Eight Years from lapse of the policy/settlement of claim.
6	Contracts/Agreements/Purchase Orders	Fresh/Modification/Renewal/ Termination of Contract/Agreement/Purchase Order	Eight Years from termination of Contract/Agreement/Purchase Order
7	Records related to Property	Agreements, Contracts, Documents related to acquisition/sale of Property	Permanent
8	Legal	All confidential agreements of non-disclosure in nature, Correspondence with Statutory bodies, Courts regarding any petition/case/suit etc.	Permanent
9	Records related to Labour Laws	Registration/Renewal Certificate under various Acts relating to Labour Laws. Maintenance of various Registers under	Permanent



		various Acts in force read with the Rules made thereunder, relating to Labour Laws.	
10	Finance	Audited Financial Statements Auditors Reports	Permanent
		Books of Accounts and Vouchers	Eight Years following the relevant Financial Year.
11	Taxation	Registration/Amendment Certificate under various laws in force	Permanent
		Preservation of specific books of accounts	8 Financial Years following the relevant Financial Year.
		Records pertaining to various other laws in force	Records maintained under various other laws in force from time to time would be acceptable.
12	RBI Records	<ul style="list-style-type: none"> <li>• License Certificate/Renewal Certificate.</li> <li>• Statutory Returns/Reports submitted to Banks from time to time.</li> </ul>	Permanent
		<ul style="list-style-type: none"> <li>• Concurrent Audit Report.</li> <li>• Correspondence with Statutory Bodies.</li> <li>• Auditors Report</li> </ul>	Eight Years following the relevant Financial Year
		<ul style="list-style-type: none"> <li>• Client Records and Transactions pursuant to 'Know Your Customer'(KYC) Guidelines – Anti Money Laundering Standards (AML) – 'Preservation of Money Laundering Act,2002</li> <li>• Records pertaining to the identification of the customers and their address (e.g. Copies of Documents like assport, identity card, driving license, PAN Card, Utility Bills etc) obtained while opening the account and during the course of business relationship.</li> </ul>	Eight Years after completion of the relevant transaction.
13	License obtained from Statutory Authorities	Statutory Registration Certificates	Permanent