

Reference	EOP/ESG/DAP/01 Version: August 06, 2018
Policy Title	Document Archival Policy
Entity	Embassy Office Parks Management Services Private Limited ("Company"/ "Manager") in its
	capacity as the Manager of Embassy Office Parks Real Estate Investment Trust ("Embassy
	REIT")

Revision History				
Version #	Version Date	Change Type		
V1	August 06, 2018	Created		

	Document Review Cycle					
#	Effective Date	Next review date	Policy Owner			
1	August 06, 2018	Q4 Board Meeting Date of the Manager of every Financial Year	Company Secretary			
			and			
			Compliance Officer			

Applicability	This policy is applicable to Embassy REIT, its Manager, Special Purpose Vehicles of Embassy REIT ("SPVs") and Holding Company of Embassy REIT ("Holdco")		
Introduction & Purpose	The Document Archival Policy aims to provide a comprehensive policy on the preservation and conservation of the records and documents, both Physical and Electronic, of Embassy REIT, its Manager, SPVs and the Holdco. The Document Archival Policy aims at identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records.		
	 All records and documents along with all the supportive documents which are physically available shall be maintained at the principal place of business of the respective entity or such other secured place as may be decided and approved by the board of directors of the Manager from time to time. Electronic records and electronic version(s) of physical records are to be maintained within the Company's centralized electronic record software database, which is maintained by the IT Services Department; 		
	2. All the documents required to be maintained in terms of the Securities and Exchange Board of Indian (Real Estate Investment Trusts) Regulations, 2014, ("SEBI REIT Regulations"), Secretarial Standards, Listing Agreement, and any applicable law, shall be preserved under the custody of the Compliance Officer of Embassy REIT;		
	3. All financial records required to be maintained in terms of the SEBI REIT Regulations, prescribed Accounting Standards, Income Tax Act, 1961 and other applicable law, shall be maintained under the custody of the Chief Financial Officer of the Manager;		
Key Terms	4. All the statutory documents shall be preserved for a minimum period of eight financial years, immediately preceding a Fiscal, and since creation of Embassy REIT, when Embassy REIT has been created for a period of less than 8 (eight) years; or such longer duration if prescribed under applicable law. Documents shall be preserved in a chronological order for each Fiscal;		
	5. Legal Documents:		
	Legal Documents shall include, but shall not be limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matter and they shall be preserved in the following manner:		
	a. A contract shall be retained for a period of 8 (Eight) Years or for 8 (Eight) Years after the expiry of the term of the contract, whichever is higher.		
	b. Documents relating to any property owned by the Company shall be retained		



- perpetually. Other property Documents shall be retained for a period of 8 (Eight) Years or for a period of 8 (Eight) Years after the rights in such property ceases to exist, whichever is higher.
- c. Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded shall be retained permanently. Interim Orders shall be retained till a Final Order is received or for a period of 8 (Eight) Years whichever is higher.
- d. Pleadings shall be retained for a period of 8 (Eight) Years or till the matter has been disposed off, whichever is higher.
- e. Legal documents shall be maintained under the custody of the Legal Department in consultation with the General Counsel and the Compliance Officer of Embassy REIT.
- 6. Human Resources (HR) records shall be maintained under the custody of Human Resource Department for a period of 8 (Eight) Years;
- 7. Documents which are confidential in nature shall, wherever possible, be kept under lock and key and shall be shared on a need to know basis only with persons directly involved in the transaction involving such documents and records;
- 8. If required under applicable law, some of the registers and records may be required to be kept open by Embassy REIT for inspection by directors of the Manager and Unitholders of Embassy REIT and by other persons, including creditors of Embassy REIT. Upon receipt of advance notice from a unitholder or from any other specified person the Embassy REIT shall facilitate inspection of such documents by such persons and allow extracts to be taken from certain documents, registers and records and to furnish copies of certain documents, registers and records. Such documents and records shall be kept open for inspection during the business hours of Embassy REIT without payment of any fee;
- 9. Documents and information which are statutorily required to be hosted on Embassy REIT's website shall be hosted within the prescribed timeline from the occurrence of the event. All the data and information shall be hosted on Embassy REIT's website for a minimum period of five years or for such minimum period as prescribed under applicable law. After such period, it shall be preserved in the archival folder of Embassy REIT maintained offline, until it is destroyed upon the expiry of the statutory period for the preservation such documents.
- 10. Each head of department shall identify and at all times maintain a schedule of temporary and permanent documents for which any specific period of retention is not prescribed by law but which are required to be maintained in the interests of Embassy REIT.
- 11. Documents and records may be destroyed after the expiry of the statutory period for the preservation the documents after keeping a suitable record of documents destroyed subject to approval from the General Counsel and the Compliance Officer of Embassy REIT.
- 12. Records maintained for which no minimum preservation time period is prescribed by law and which are not required to be maintained permanently may be destroyed after keeping a suitable record of documents destroyed subject to approval from the General Counsel and the Compliance Officer of Embassy REIT.