

ARCHIVAL POLICY OF PHOENIX TOWNSHIP LIMITED

1. Objective

In terms of Regulations 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Regulations'), a listed entity is required to host on the website maintained by the entity, all the material events/ information as disclosed to the stock exchange(s) for a period of five years and thereafter in terms of the archival policy of such entity as disclosed on the website.

Phoenix Township Limited (the "Company") has formulated this Archival Policy (the 'Policy') for ensuring compliance with the provisions under Regulation 30(8) of the Regulations for protection, maintenance and archival of the Events or Information (defined below) disclosed to the stock exchange(s) which are also hosted on its website. Additionally, the Policy shall also include such other Events or Information which are required to be hosted on the website of the Company in terms of other Applicable Laws (defined below) as may be decided by the Authorised Person (defined below).

2. Effective Date

This Policy has been adopted by the Board of Directors of PHOENIX TOWNSHIP LIMITED ('the Company') at its Meeting held on 09th February, 2016 and the effective date of this policy is December 01, 2015.

3. Definitions -

- a. **"Act"** means the Companies Act, 2013.
- b. **"Applicable Law"** means any law, rules, circulars, guidelines or standards under which disclosure of Events or Information on the website has been prescribed.
- c. **"Archived documents"** means details of Events or Information (defined hereinbelow) as placed or maintained in the archived folder.
- d. **"Authorised Person"** means Company Secretary of the Company or any other person as may be decided by the Board or Managing Director or Whole Time Director from time to time.
- e. **"Board"** means the Board of directors of the Company or its Committee.
- f. **"Company"** means Phoenix Township Limited.
- g. **"Events or Information"** refers to the information/ events that are required to disclose on the website of the Company in terms of Regulation 30(8) of the Regulations and other Applicable Law.

- h. **“Key Managerial Personnel”** mean key managerial personnel as defined in sub-section (51) of section 2 of the Companies Act, 2013
- i. **“Listing agreement”** shall mean an agreement that is to be entered into between a recognised stock exchange and the Company pursuant to Securities and Exchange Board (Listing Obligations and Disclosure Requirements), 2015
- j. **“Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Listing Agreement, Regulations or any other applicable law or regulation to the extent applicable to the Company.

4. Coverage

This policy covers archival of all Events or Information which has been disclosed to Stock Exchange(s) and hosted on the website of the Company in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Applicable Laws.

5. Classification

The archival of Events or Information as disclosed or hosted on the website shall be done in the following manner:

- a) Where there is a period for which a Document is required to be archived as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for a period of not less than three years.

6. Location of archival

The archived folder shall be located on the intra-net drivers of the Company.

7. Authority for approval of Policy

The Board shall have the authority for approval of this policy in pursuance to this Regulation.

8. Authority to make alterations to the Policy

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

9. Responsibility to review the website and Archived documents

In accordance with the provisions of Regulation 46 (3), the Authorised Person shall ensure to update any change in the content of the website within two working days of such change. The Authorized person of the Company shall be responsible for periodic and ongoing review of the contents of the website and keep the information up to date.

The contents with respect to Events or Information as disclosed under Regulation 30(8) of the Regulations would be moved to the archived folder after a period of 5 years from the date on which such disclosures/ announcements were made.

The contents with respect to Events or Information other than those mentioned above shall be moved to archived folder at such frequency as may be decided by the Authorised person subject to the provisions under Applicable Law, if any.

10. Removal of Archived documents

The archived documents will be available in the archived folder for a period of three years. After the expiry of three years, the archived disclosures/ announcements shall be removed from the website of the Company.

11. Access to the Archived documents

The contents of archived folder shall not be accessible to public.

12. Interpretation

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, regulation or standard. Any change in the prescribed period of archiving in the Regulations or the other Applicable Laws shall mutatis mutandis apply to the corresponding related Clause of the Policy.
