MARATHON NEXTGEN REALTY LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

INTRODUCTION:

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 **("Listing Regulations")**, the Board of Directors (the "**Board**") of Marathon Nextgen Realty Limited (MNRL) has adopted this Policy at its meeting held on February 12, 2016, for Preservation of Documents, as required under applicable regulations.

This Policy is effective from **December 01, 2015**. 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 this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

OBJECTIVES:

To determine preservation period for records/documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

• Company's own information retrieval needs (reference value)
• Statutory requirements under respective statutes.
• Litigation requirements
• To ensure easy retrieval.
• To ensure that unwanted records do not occupy storage space.

DEFINITION:

In this policy unless the context otherwise requires:

a.   "**Act**" means the Companies Act, 2013 and rules made there under, as amended from time to time

b.   "**SEBI Regulations**" shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time

c.   "**Company**" means Marathon Nextgen Realty Limited (MNRL)

d. "**Document**" includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

e. "**Key Managerial Personnel**" or "**KMP**" shall have the same meaning ascribed to it under the Act.

f. "**Board**" or "**Board of Directors**" shall mean the Board of Directors of Marathon Nextgen Realty Limited, as may be re-constituted from time to time

g. "**Financial Year**" shall have the same meaning ascribed to it under the Act.

h. "**Electronic Form**" with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

SCOPE:

These guidelines will be valid for determining preservation period for commercial and legal
records; and will be applicable to all locations of the Company.

RESPONSIBILITY:

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

PRESERVATION PERIOD:

The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made; the preservation period of agreements starts with the end of the financial year in which the agreement period expires.

For determining the preservation period, the records are categorized into following three categories:

Category & Description	Period of Preservation
Records/documents with short reference value – i.e. Records, which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc.	Less than 8 years
Records / documents required to be maintained as per statutory requirements and having higher reference value – i.e. records having contractual / legal implications, which need to be preserved for a prescribed periods per statutory requirement; and records, which need to be, preserved for a particular period according to Company's own reference needs.	Documents to be preserved for a period of 8 to 12 years (Illustrative list of documents to be maintained for 8 to 12 years is annexed)
Records which will have a permanent value for the Company even after the expiry of legal preservation period. Permanent Records which are required for adducing evidence in judicial or quasi judicial or other dispute redressal forum.	Till the time the matters are finally disposed of.

Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi judicial for a and other mediation and alternate dispute for a, industrial disputes, etc. are preserved according to specific needs and even beyond the prescribed period.

Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government / Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines / instructions, if any, by the issuing authority.

PRESERVATION LOCATION:

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

MODE OF PRESERVATION:

Records/documents may be preserved either physically or in electronic form.

DESTRUCTION OF RECORDS:

The records/documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal.

GENERAL AUTHORISATION:

The Policy shall be reviewed on a periodic basis and the Chairman and Managing Director / Whole-time Directors and Company Secretary are authorized jointly (by any two) to make such changes as may be deemed necessary or as warranted by law.