



HUBTOWN LIMITED

POLICY ON ARCHIVAL
OF
EVENTS AND INFORMATION

[Effective from December 1, 2015]

HUBTOWN LIMITED
POLICY ON ARCHIVAL OF EVENTS AND INFORMATION
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POLICY ON ARCHIVAL OF EVENTS AND INFORMATION

1. PREAMBLE :

- 1.1 The Securities and Exchange Board of India has on September 2, 2015 notified 'Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, ('SEBI Listing Regulations, 2015') to be effective from December 1, 2015;
- 1.2 The Regulations mandates every listed entity to formulate an archival policy.
- 1.3 Accordingly, based on this requirement, the Policy on archival of events and information has been framed and is being implemented.

2. OBJECTIVES OF THE POLICY :

The objective of the Policy is to comply with the requirement of Regulation 30 (8) of SEBI Listing Regulations, 2015, which is reproduced hereinbelow :

'The listed entity shall 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 listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on the website.'

3. APPLICABILITY OF THE POLICY :

This Policy shall apply to such events / information which have been disclosed to the stock exchanges and are visible to the public on the website of the Company : www.hubtown.co.in.

4. ARCHIVAL REQUIREMENT :

- 4.1 All information / documents / data / events ('the **Disclosed Information**') under Regulation 30 and the relevant information with respect to its listed debt securities under Regulation 62, as disclosed to the Stock Exchanges, shall be disclosed on the website of the Company : www.hubtown.co.in and shall be hosted on the website for a minimum period of 5 (five) years from the date of each such disclosure ('**Statutory Hosting Period**').
- 4.2 In case the Disclosed Information is required by any applicable law or regulation to be hosted for a period longer than the Statutory Hosting Period, then such Disclosed Information shall remain hosted on the website of the Company for such longer period.
- 4.3 Beyond the Statutory Hosting Period, the Disclosed Information shall be archived for such other additional period as may be required considering the requirement of various Laws, Rules and Regulations.
- 4.4 No Disclosed Information shall be deleted or destroyed or purged from the website or from the archival without the prior written approval of anyone of the Managing Director, the Chief Financial Officer and the Company Secretary.

5. ARCHIVAL MECHANISM :

- 5.1 The Disclosed Information which is more than 5 (five) years old will be archived from the website of the Company and shall be maintained by the Company for a further period of 3 (three years) in the Archived Section under the respective heads. These archives shall be made available on a written request made to the Compliance Officer of the Company.
- 5.2 The Disclosed Information will be removed from the Archived Section after a period of 3 (three) years from the date of transferring the same to the Archived Section.
- 5.3 Back-up of the website contents should be taken once a month and preserved separately on the network drive.

6. RESPONSIBILITY OF ARCHIVAL OF DISCLOSED INFORMATION :

It will be the responsibility of the website developer to maintain the archival information on the website and to preserve or back-up the contents of the website as per the Policy stated above. Regular retrieval and checks should be carried out by the website developer to verify the website contents backed up.

7. DISCLOSURE ON THE WEBSITE :

This Policy shall be disclosed on the website of the Company.

8. INTERPRETATION :

In case of any conflict between the provisions of this Policy and the Statutory Provisions, the Statutory Provisions shall prevail over this Policy.

9. AMENDMENTS TO THE POLICY :

The Board reserves the right to review and amend this Policy as and when necessary. Any or all of the provisions of this Policy shall be subject to revision / amendment in accordance with the Rules, Regulations, Circulars, Notifications, etc. on the subject as may be issued by the relevant statutory authorities from time to time.

In case of any amendment(s), clarification(s), circular(s), etc. issued by the relevant authorities not being consistent with the provisions laid down in this Policy, then such amendment(s), clarifications(s), circular(s), etc. shall take precedence over the provisions of this Policy and this Policy shall stand amended from the date of specified in such amendment(s), clarifications(s) or circular(s).

Title	Policy on archival of events and information	Approved by	Board of Directors
Version	1	Date	November 14, 2015