

Policy for Preservation of Documents

1. Legal Framework

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposes certain obligations and disclosure requirements on all listed entities. One of the common obligations for all listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

Accordingly, the Board of Directors of Champion Commercial Company Limited ("the Company") has approved this Policy for Preservation of Documents.

2. Definitions

"Board"

Board shall mean the Board of Directors of Champion Commercial Company Limited.

"Company"

Company shall mean "Champion Commercial Company Limited".

"Documents"

Documents shall mean all papers, records, files, books, etc., be in printed or in digital form and the like as required to be maintained under any law or regulation for the time being in force.

"Listing Regulations"

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

3. Objective

The purpose of this Policy is to have a framework for the preservation of documents of the Company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

Documents whose preservation shall be permanent in nature as given in Annexure 1 attached to this Policy.

Documents with preservation period of not less than eight (8) years after completion of the relevant transactions as given in Annexure 2 attached to this Policy.

Provided that the Company may keep the documents as specified above in electronic / digital mode

4. Roles & Responsibilities

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

Champion Commercial Co. Ltd.

GLOBAL SOLUTIONS, *delivered locally*

305 Embassy Centre
Nariman Point
Mumbai – 400021 INDIA
T: + 91 22 4039 4100 / 2282 4747
F: + 91 22 2285 3725
E: mumbai@singhaniagroup.com
www.singhaniagroup.com

5. General

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time. The Company will preserve documents relating to matters which are continuing in nature and are relevant to understanding of business.

6. Destruction of Documents

After the expiry of the retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both physical and electronic Documents.

7. Removal of Difficulties

The Chief Financial Officer and the Company Secretary shall be jointly authorized to address any question or doubt and remove any difficulty during the course of implementation of this Policy in accordance with the same.

8. Amendments

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy.

Annexure 1:

Documents whose preservation shall be permanent in nature:

Registration Certificates

Licenses & Statutory Approvals

Statutory registers required under applicable laws

Audited financial statements

Minutes of General Meeting

Minutes of Board Meeting

Minutes of Statutory Committee Meetings

Material Agreements/Contracts, which, even if terminated, may have an impact on business

Orders/judgments issued by Courts/statutory bodies and other background documents relevant for understanding such Orders

Investment documents/proofs including certificates, etc.

Title deeds and documents pertaining to immovable freehold and leasehold properties any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Champion Commercial Co. Ltd.

GLOBAL SOLUTIONS, *delivered locally*

305 Embassy Centre
Nariman Point
Mumbai – 400021 INDIA
T: + 91 22 4039 4100 / 2282 4747
F: + 91 22 2285 3725
E: mumbai@singhaniagroup.com
www.singhaniagroup.com

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 documents and related correspondences, if any

Annexure 2:

Documents with preservation period of not less than eight (8) years:

Books of Accounts

Annual Return(s)

Personnel Documents after retirement/resignation of the person concerned

Insurance Policies/ Claims under various policies after expiry or receipt of claim

Correspondences with Departments/shareholders

Non-Statutory Registers/Documents

All Emails received from Internal and External Sources related to business issues

Documents as are required to be maintained under relevant laws relating to direct and indirect tax

Any other document as may be required to be maintained for eight years in terms of applicable law(s).

- The policy shall come into effect from April 14, 2017.