

## DOCUMENT ARCHIVAL POLICY

<b>Approving Authority</b>	Board of Directors (“Board”) of K Raheja Corp Investment Managers Private Limited (Formerly known as “K Raheja Corp Investment Managers LLP) (“ <b>Manager</b> ”) in its capacity as the Manager of Mindspace Business Parks REIT (“ <b>Mindspace REIT</b> ”)
<b>Approval Date</b>	July 17, 2023
<b>Amendment date</b>	October 30, 2023
<b>Effective Date</b>	This policy on archival of documents (“ <b>Document Archival Policy</b> ” or “ <b>Policy</b> ”) shall come into effect from the date of adoption (including Amendments) by the Board of Manager, from time to time.

### 1. APPLICABILITY:

This Policy is applicable to Mindspace REIT, its Special Purpose Vehicles of Mindspace REIT (“SPV’s) (“**Mindspace REIT Group**”) and Manager

### 2. OBJECTIVE AND PURPOSE:

- a. This Policy seeks to record the process and procedure involved in document archival of Mindspace REIT Group and Manager.
- b. This Policy has been formulated in terms of the provisions of the Securities and Exchange Board of India (Real Estate Investment Trusts) Regulations, 2014 (“**REIT Regulations**”) or such other applicable laws

### 3. DEFINITIONS:

- i. “**Applicable Law**” means any statute, law, regulation, ordinance, rule, judgement, order, decree, bye-law, approval of any Governmental Agency, directive, guideline, policy, requirement or other government restriction or any similar form of decision of or determination by, or any interpretation having the force of law of any of the foregoing Governmental Agency having jurisdiction, applicable to any Party, in force from time to time, including but not limited to the REIT Regulations;
- ii. “**Act**” means the Companies Act, 2013 as amended from time to time.
- iii. “**Board of Directors**” shall mean the Board of Directors of the Manager.
- iv. “**SEBI**” shall mean Securities and Exchange Board of India.
- v. “**Offer**” shall mean the initial offer of Units to public by Mindspace REIT.
- vi. “**REIT Regulations**” shall mean SEBI (Real Estate Investment Trusts) Regulations, 2014, as amended from time to time and circulars issued by the Securities and Exchange Board of time to time.
- vii. “**Unit**” shall mean an undivided beneficial interest in Mindspace REIT, and such Units together represent the entire beneficial interest in Mindspace REIT.

viii. **“Unitholders”** shall mean any person who holds any Unit of Mindspace REIT.

#### **4. DOCUMENT ARCHIVAL:**

The Document Archival Policy aims to provide a comprehensive policy on the preservation and conservation of the records and documents of Mindspace REIT Group and Manager.

The Document Archival Policy aims at identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records.

The key principles of the Policy inter alia are set out below::

- (i) The Manager shall be responsible for the safe keeping of all documents of Mindspace REIT;
- (ii) All records and documents along with all the supportive documents, including minutes of meetings of the Board of Directors and/or Committees, Minutes of the Meetings of Shareholders/Unitholders, press releases and public filings, employment records etc. which are physically available shall be maintained at the principal place of business of Mindspace REIT and/or registered office of Asset SPVs/Manager or such other secured place as may be decided by chief executive officer / chief financial officer
- (iii) All the documents required to be maintained in terms of the REIT Regulations, secretarial standards, listing agreement, and any applicable law, shall be preserved within the safe custody of compliance officer of the Manager adequate safety as may be required for the protection of the documents;
- (iv) All financials records required to be maintained in terms of the REIT Regulations, prescribed accounting standards, Income Tax Act, 1961 and other Applicable Law, shall be maintained within the custody of the a responsible person(s) as may be identified by the Manager;
- (v) All the statutory documents shall be preserved for a minimum period of eight financial years, immediately preceding a financial year, and since creation of Mindspace REIT, when Mindspace REIT has been created for a period of less than eight years; or such longer duration if prescribed under Applicable Law. Documents shall be preserved in a chronological order for each financial year;
- (vi) 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;
- (vii) If required under Applicable Law, some of the registers and records may be required to be kept open by Mindspace REIT for inspection by Unitholders of Mindspace REIT and by other persons, including creditors of Mindspace REIT. Upon receipt of advance notice from a unitholder or from any other specified person Mindspace 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 Mindspace REIT without payment of any fee;

- (viii) Documents which are statutorily/legally required to be hosted on Mindspace REIT website shall be hosted within the prescribed timeline from the occurrence of the event. All statutory data shall be hosted on Mindspace REIT website for a minimum period of five years or for such minimum period as prescribed under applicable law or as maybe decided by the Board of Directors. After which it shall be preserved in the archival folder of Mindspace REIT's maintained offline until it is destroyed upon the expiry of the statutory period for the preservation such documents;
- (ix) The Manager shall ensure that in the event of a major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other activities of Mindspace REIT; and
- (x) The Manager shall ensure appropriate provision for the backup of the digital collections of Mindspace REIT have been made, including the provision of offsite security copies and that the backup copies are actively maintained to ensure their continued viability.
- (xi) The Manager may make an appropriate arrangement with document storage service provider to preserve the hard copies of the documents pertaining to the Mindspace REIT Group and Manager.
- (xii) Documents and records may be destroyed after the expiry of the statutory period for the preservation of the documents after keeping a suitable record of documents destroyed, subject to approval from the Chief Financial Officer and the Company Secretary and Compliance Officer.

## **5. AMENDMENT OF POLICY**

Notwithstanding the above, this Policy will stand amended to the extent of any change in Applicable Laws. The Board of Directors of the Manager reserves the right to amend or modify this Policy in whole or in part.

