



**SHREM INFRA INVESTMENT MANAGER PRIVATE LIMITED**  
*(Formerly Known as Shrem Financial Private Limited)*

**DOCUMENT ARCHIVAL POLICY OF SHREM INVIT**

This Policy is initially approved by the Board of the Investment Manager with effect from 22<sup>nd</sup> February 2021. The same has been amended on 5<sup>th</sup> May 2025 by the approval of the Board of the Investment Manager with immediate effect.

***Note: This Policy supersedes all the previous versions of Policy and/or any communication on this subject.***

## **DOCUMENT ARCHIVAL POLICY OF SHREM INVIT**

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- A. **Preamble:** The document archival policy (“**Policy**”) aims to provide a comprehensive policy on the preservation and conservation of the records and documents of Shrem InvIT (the “**Trust**”). It provides guidance on the preservation and management of documents to help ensure the authenticity, reliability and accessibility of such documents. The policy aims at identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records. It stipulates the duration and manner in and place at which records and documents of the Trust shall be preserved. Accordingly, Shrem Infra Investment Manager Private Limited (the “**Investment Manager**”), the investment manager to the Trust appointed pursuant to the Investment Management Agreement dated January 12, 2021, has formulated this Policy.

- B. **Type of Documents:** The Trust’s records and documents can be classified as physical and electronic records. Documents can also be categorised into documents to be preserved for limited life span and those to be preserved permanently.

Physical records would consist of all the hand written or printed and signed books and records maintained by the Investment Manager in physical form. Electronic records would comprise of all such documents which are digitally or virtually maintained in the electronic forms. Electronic record shall be authenticated by digital signatures.

- C. **Place of Preservation of documents and records:** All records and documents along with all the supportive documents which are physically available shall be maintained at the principal place of business of the Trust, presently being 1101, Viraj Towers, Junction off Andheri Kurla Road, W.E. Highway near Land Mark Building, Andheri (East), Mumbai 400 069. All the documents required to be maintained in terms of the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014 as amended or supplemented, including any guidelines, circulars, notifications and clarifications framed or issued thereunder (“**InvIT Regulations**”), secretarial standards, listing agreements, and any applicable law, shall be preserved under the custody of the compliance officer of the Trust.

All financials records required to be maintained in terms of the InvIT Regulations, prescribed accounting standards, Income-tax Act, 1961 and other applicable law, shall be maintained under the custody of the finance and accounts department.

For paucity of space at the principal place of business of the Trust, data may be kept at an external storage facility, provided that the data so preserved is capable of being easily accessed and retrieved when need be.

- D. **Method and tenor of preservation:** All the statutory documents shall be preserved for a minimum period of eight financial years, immediately preceding a financial year, and since creation of the Trust, when the Trust 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 manner for each financial year. The person in charge of custody of the documents shall be responsible for proper maintenance and safe keeping of documents under his custody. The Trust shall maintain back-up of all documents preserved in the electronic form.

Documents which are confidential in nature shall, wherever possible, be kept under lock and key and shall be shared on need-to-know basis only with persons directly involved in the transaction involving such documents and records.

- E. **Maintenance of Books of Accounts and Financials:** Books of accounts and all financial records required to be kept in terms of the InvIT Regulations, the Companies Act, 2013, prescribed accounting standards, Income Tax Act, 1961 and other applicable law, shall be maintained under

the custody of the head of the Account Department of the Investment Manager in such manner as prescribed under applicable law and amendments thereto.

**F. Inspection:**

If required under applicable law, some of the registers and records may be required to be kept open by the Trust for inspection by directors of the Investment Manager and unitholders of the Trust and by other persons, including creditors of the Trust. Upon receipt of advance notice from a unitholder or from any other specified person the Trust 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 the Trust without payment of any fee.

**G. Documents hosted on the Trust website:** Documents which are statutorily required to be hosted on the Trust website shall be hosted within the prescribed timeline from the occurrence of the event. All statutory data shall be hosted on the Trust website for a minimum period of five years or for such minimum period as prescribed under applicable law, after which it shall be preserved in the archival folder of the Trust maintained offline, until it is destroyed upon the expiry of the statutory period for the preservation such documents.

**H. Register of documents destroyed to be maintained:** Documents and records may be destroyed after the expiry of the statutory period for the preservation the documents or after the expiry of eight financial years in accordance with Paragraph D, whichever is later, after keeping a suitable record of documents destroyed.

**I. Conflict with applicable law:** The Policy shall not contradict with the provisions of any applicable law. In case of any discrepancy, the provisions of applicable law shall prevail over the provisions of this Policy.

**J.** Notwithstanding the above, this Policy will stand amended to the extent of any change in applicable law, including any amendment to the InvIT Regulations, without any action from the Investment Manager or approval of the Unitholders of the Trust.

Adopted by the Board of Directors of Shrem Infra Investment Manager Private Limited on behalf of the Trust on February 22, 2021 and amended on May 5<sup>th</sup>, 2025.

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