

Policy Title	Document Archival Policy
Entity	Bagmane Realty Investment Manager Private Limited (acting as Investment Manager to Bagmane Prime Office REIT)
Approval Date	28 th December, 2025
Approving Authority	Board of Directors of Bagmane Realty Investment Manager Private Limited (acting as Investment Manager to Bagmane Prime Office REIT)

DOCUMENT ARCHIVAL POLICY

1. Overview:

This Policy has been formulated in accordance with the provisions of the Securities and Exchange Board of India (Real Estate Investment Trusts) Regulations, 2014, as amended (“**REIT Regulations**”).

2. Applicability:

This Policy shall be implemented by the Bagmane Realty Investment Manager Private Limited (“**Manager**”) and is applicable to the Bagmane Prime Office REIT (“**Bagmane REIT**”), the HoldCo and the SPVs.

Each of the board of directors of the HoldCo and the SPVs shall adopt this Policy for relevant application in its organisation and functions and share all information and documentation with the requisite authority specified under this Policy for the purpose of maintenance of the records in accordance with the terms of this Policy.

3. Objective of the Policy

This Policy seeks to record the process and procedure involved in document archival of the Bagmane REIT and aims to set out a comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- c) Identification of the records of the Bagmane REIT that are of continuing administrative and historical value to warrant their transfer to and preservation in the Bagmane REIT’s archives.

4. Definitions:

“**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 or 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.

“**Board**” shall mean the board of directors of the Manager.

“**Bagmane REIT**” / “**REIT**” shall mean the Bagmane Prime Office Real Estate Trust.

“**Document Archival Policy**” / “**Policy**” shall mean this policy on archival of documents, as amended from time to time.

“**HoldCo**” shall mean Bagmane Developers Private Limited, and such other holding company that shall form part of the Bagmane REIT in the future as defined under the Regulation 2(1)(qa) of the REIT Regulations.

“**Listing Agreement**” shall mean the listing agreement entered into by the Bagmane REIT with the Stock Exchanges in line with the format as specified under the SEBI number CIR/CFD/CMD/6/2015 dated October 13, 2015 on ‘*Format of uniform Listing Agreement*’.

“**Manager**” shall mean Bagmane Realty Investment Manager Private Limited.

“**Offer**” shall mean the initial offer of Units to the public by the Bagmane REIT.

“**REIT Regulations**” shall mean SEBI (Real Estate Investment Trusts) Regulations, 2014, as amended from time to time and circulars, notifications or guidelines issued by SEBI from time to time.

“**SEBI**” shall mean the Securities and Exchange Board of India.

“**SPVs**” shall collectively mean Bagmane Rio Private Limited, Bagmane Green Power LLP and such other SPVs that shall form part of Bagmane REIT in future.

“**Unit**” shall mean an undivided beneficial interest in the Bagmane REIT, and such Units together represent the entire beneficial interest in the Bagmane REIT.

“**Unitholders**” shall mean any person who holds Units.

5. Document Archival:

The Document Archival Policy aims to provide a comprehensive policy on the preservation and conservation of the records and documents of the Bagmane REIT and identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records. The key principles of the Document Archival Policy, amongst others, are set out below:

- a) The Manager shall be responsible for the safe keeping of all documents with respect to the functioning of the Bagmane REIT, HoldCo and the SPVs;
- b) All records and documents, along with all the supportive documents, including minutes of meetings of the Board and committees, press releases and public filings, employment records, etc. which are physically available shall be maintained at the principal place of business of the Bagmane REIT or such other secured place as may be decided by the Board or any person authorised by the Board;

- c) 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 in adequate safety as may be required for the protection of the documents;
- d) 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 safe custody of the accounts head of the Manager;
- e) All the statutory documents, including the proper books of account, records and documents, etc., shall be preserved for a minimum period of eight financial years since creation of the Bagmane REIT or such longer duration if prescribed under Applicable Law. For instance, statutory documents such as minutes of meetings of the board of directors, shareholders and committees and register of members shall be preserved permanently in accordance with Applicable Law. All documents shall be preserved in a chronological order for each financial year;
- f) 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;
- g) If required under Applicable Law, some of the registers and records may be required to be kept open by the Bagmane REIT for inspection by Unitholders and by other persons, including creditors of the Bagmane REIT. Upon receipt of advance notice from a Unitholder or from any other specified person, the Bagmane 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 the Bagmane REIT without payment of any fee;
- h) Documents which are statutorily / legally / contractually required to be kept or provided to any person or parties including the trustee of the Bagmane REIT, banks, financial institutions or any government agencies shall be provided to such persons or agencies;
- i) Documents which are statutorily / legally required to be hosted on the Bagmane REIT's website shall be hosted within the prescribed timeline from the occurrence of the event. Such data shall be hosted on the Bagmane REIT website for a minimum period of five years or for such minimum period as prescribed under Applicable Law or as decided by the Board from time to time. After which it shall be preserved in the archival folder of the Bagmane REIT maintained offline, until it is destroyed upon the expiry of the statutory period for the preservation of such documents;
- j) 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 the Bagmane REIT; and

- k) The Manager shall ensure appropriate provision for the backup of the digital collections of the Bagmane REIT has been made, including the provision of offsite security copies and that the backup copies are actively maintained to ensure their continued viability.

6. Access and Authenticity

The preservation of the records of the Bagmane REIT is vital in order to ensure, current and future, access to the records. Further, preservation is also concerned with ensuring the authenticity of records. The chief financial officer and compliance officer may prepare a matrix for identifying persons who will be allowed to access different kinds of records maintained and preserved by the Manager. Since the records are maintained at different levels and departments, the functional heads should be authorised to ensure the preservation and access to the records under their jurisdiction.

7. Record Appraisal

The Manager shall, at regular intervals, carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process is to ensure the records are examined at the appropriate time to determine whether or not they are worthy of archival preservation, whether they need to be retained for a longer period, as they are still in use, or whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the Board.

8. Amendment of the Policy

Notwithstanding the above, this Policy shall stand amended to the extent of any change in Applicable Laws without any action of the Manager or approval of the Unitholders. The Board reserves the right to amend or modify this Policy, in whole or in part, from time to time.