



POLICY FOR PRESERVATION OF DOCUMENTS

OF

RESTAURANT BRANDS ASIA LIMITED

(Formerly known as Burger King India Limited)

Document Control:

Version	Approved by	Date
Version 1.0	Board of Directors	October 17, 2019
Version 2.0	Board of Directors	August 12, 2022

1. BACKGROUND

The Securities and Exchange Board of India (“SEBI”) vide its notification dated September 2, 2015 issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “**SEBI Listing Regulations**”) *inter alia* mandating listed entities to frame policy(s) for preservation and archiving of documents.

2. PURPOSE

The purpose of this document is to formulate a policy for preservation of documents in accordance with Regulation 9 of the SEBI Listing Regulations so as to provide a framework for their adequate protection and preservation as per applicable laws.

3. DEFINITIONS

“**Applicable laws**” means securities laws defined under Regulation 2(1)(zf) of the SEBI Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

“**Board**” means board of directors of the Company as constituted from time to time.

“**Company**” means Restaurant Brands Asia Limited.

“**Document/s**” includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical and / or electronic form.

“**Policy**” means this Policy on Preservation of Documents formulated by the Company.

4. SCOPE

All Documents of the Company shall be maintained in compliance with the requirements of the Applicable Laws, including the SEBI Listing Regulations.

5. CLASSIFICATION OF DOCUMENTS

For the purpose of the Policy, the Documents of the Company, as approved by the Board, are classified as follows:

- (i) Documents which need to be preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any other changes made therein from time to time.
Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company.
- (ii) Documents with a preservation period of not less than the time period stipulated in the SEBI Listing Regulations or Applicable Laws and any other laws and / or statutes that may be applicable to the Company from time to time after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any other changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for the said period. Presently, the time period stipulated under Regulation 9(b) of the SEBI Listing Regulations is a minimum of 8 (eight) years after completion of the relevant transactions.

6. MODES OF PRESERVATION

- The Documents may be preserved in physical form and / or electronic form.
- The officer(s) of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents (authorized person).
- The preservation of Documents should be in such a manner so as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- The preserved Documents must be accessible at all reasonable times by the concerned personnel of the Company. Access may be controlled by the authorized person for preservation, so as to ensure integrity and confidentiality of the Documents and to prohibit unauthorised access.
- The Company shall make appropriate provisions for regular back up of all Documents preserved, both physically and electronically.

7. DESTRUCTION OF DOCUMENTS

After the expiry of the applicable retention period, the preserved Documents may be destroyed in such manner and mode as may be recommended by the authorized person and approved by the managing director of the Company. The details of Documents destroyed by the Company shall be recorded in the 'Register of Disposal of Records' to be kept and maintained by authorized persons who are disposing of the Documents in the format prescribed by the Company. This applies to both physical and electronic Documents.

8. REVIEW

This Policy may be reviewed and amended from time to time by the Board, in line with the changing regulatory requirements, or in case the Company faces any practical difficulties in implementing the Policy.

9. COMPLIANCE

All employees of the Company and/or any human resources engaged by the Company are required to comply with the provisions of this Policy and the procedures set out by the Company. Failure to comply by any employees of the Company and/or human resources engaged by the Company with this Policy and the procedures may result in disciplinary action by the Company, including suspension or termination.

Any queries regarding this Policy may be referred to the Company Secretary and Compliance Officer who is in charge of administering, enforcing and updating this Policy.

10. INTERPRETATION

In any circumstance, where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard, as applicable, will take precedence over this Policy and procedures.