

Policy for Preservation of Document(s) and Archival Policy

Preamble

This policy has been framed in accordance with requirement of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“the Listing Regulations”).

Objective

The objective of this Policy is to ensure that the official document(s) of the Company maintained in physical and/or electronic form shall be preserved for a minimum period of 8 years from the date of completion of relevant transaction. Provided that, if any other applicable law requires the preservation of document(s) for a longer period or permanently, then those document(s) shall be preserved / maintained accordingly.

Modes of Preservation

The Managing Director & CEO shall appoint Authorized person(s) responsible for preservation and custody of document(s) in physical and/or electronic form as per the requirement of applicable law to ensure that there is no tampering, alteration, destruction or anything which endangers the contents, authenticity, utility or accessibility of the document(s).

Indicative List of Document(s):

A) Document(s) to be preserved permanently

1. The Memorandum and Articles of Association;
2. Register of Charges;
3. Minutes book of General meeting and Board of Directors and Committee of Directors;
4. Register of members, along with index;
5. Register of Directors and Key Managerial Personnel;
6. Register of Directors Shareholding; and
7. Contract Register

B) Document(s) to be preserved for a period of 8 years after completion of relevant transaction

1. Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities);
2. All notices pertaining to disclosure of interest of directors;
3. Register of deposits;
4. Instrument creating a charge on assets of the Company and modification(s) thereof;
5. Office copies of Notices, scrutiniser’s report, and related papers; and
6. Loan agreement(s) with customers / borrowers along with related document(s).

C) Other Document(s):

In case of document(s) not included in indicative list mentioned in (A) & (B) above, the same will be preserved as per the requirements of the applicable Acts, Rules, Regulations of National Housing Bank, Securities and Exchange Board of India, Income Tax Department, Ministry of Corporate Affairs, Stock Exchanges and other statutory and regulatory authorities.

Place of preservation and maintenance

The document(s) shall be preserved / maintained at the Registered Office / Corporate Office / Registrar and Share Transfer Agent / Branch Office or such other places as per the requirement of applicable law as may be decided by Authorized person(s).

Destruction of Document(s)

The document(s) which are not required to be maintained on permanent basis may be destroyed by shredding or any other method on expiry of 8 years after the completion of relevant transaction. The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Department Head for the purpose. Inspection of this register is restricted.

Accounts	Accounts Head & Chief Financial Officer
IT	Chief Technology Officer
HR and Admin	Chief Human Resource Officer & Admin Head
Secretarial	Company Secretary
Business Operations including disbursement, collection, recovery and legal matters related thereto	Managing Director & CEO

The document(s) identified for destruction will be destroyed in the presence of Internal Auditor's representative and the relevant Department's representative.

Archival

All events / information required to be hosted on the website of the Company as per applicable law shall be hosted by the Company from time to time and the same shall continue to appear on the Company's website for a period of 5 years or such longer period as may be necessary as per requirement of law. Thereafter, it will remain in the archives of the Company for a period of 2 years.

Amendment

The policy will be amended from time to time by the Board of Directors.