

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL OF
DOCUMENTS
OF
CHAITANYA INDIA FIN CREDIT PRIVATE LIMITED



| Version No. | PPDAD/1.0/2016-17 |
|-----------------------------------|----------------------|
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| Amended/Modified Date of Policy | - |
| Policy owner | Samit Shankar Shetty |
| Approved by | Board of Directors |
| Signature | |

Reference: Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) mandates that a listed entity shall have a policy for preservation of documents.

1. PREAMBLE:

The Securities and Exchange Board of India (SEBI) has issued the Securities and Exchange Board of India ((Listing Obligations and Disclosure Requirements) Regulations, 2015 (" SEBI LODR") which have come into force from 1st December 2015. This requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Accordingly, the Board of Directors of Chaitanya India Fin Credit Private Limited has adopted the Policy for Preservation of Documents.

2. SCOPE:

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVE OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

- To identify statutory records to be preserved.
- To identify records to be maintained either for a period of eight years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form.
- To decide the procedure to destroy the documents after eight years or other applicable period,
- To help employees understanding their obligations in retaining and preserving the documents and records.

4. APPLICABILITY AND MODES OF PRESERVATION

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

5. DEFINITIONS:

- a) **"Act"** means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

- b) **“Board of Directors”** or **“Board”** means the collective body of the Directors of the Company.
- c) **“Company”, “This Company”, “The Company”**, wherever occur in the policy shall mean “Chaitanya India Fin Credit Private Limited”.
- d) **“Current”** means running matter or whatever is at present in course of passage.
- e) **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- f) **“Maintenance”** means keeping documents, either physically or in electronic form.
- g) **“Policy”** or **“This Policy”** means, “Policy on Preservation of Documents”.
- h) **“Preservation”** means to keep the documents preventing them from being altered, damaged or destroyed.
- i) **“Register”** means a register maintained under the Companies Act, 2013 or the SEBI Act.
- j) **“Regulations”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

6. INTERPRETATION:

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

7. ROLES & RESPONSIBILITIES:

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

8. AUTHENTICITY:

Where a document is being maintained both in physical form and Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

9. GUIDELINES:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

- a. Documents whose preservation shall be permanent in nature;
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that need to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c. Documents that need to be preserved and retained for a period of not less than three years as specified under Secretarial standards issued by The Institute of Company Secretaries of India;
- d. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- e. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure**.

10. MODES OF PRESERVATION:

The Documents may be preserved in

- a. Physical form; or
- b. Electronic Form

The official of the Company who is required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such 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. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

11. ARCHIVAL OF DOCUMENTS

Documents mentioned in Clause 9 above shall be maintained/ preserved in the following manner:

A) Documents maintained in physical form:

1. All information and/or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
2. All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.

B) Documents maintained in electronic form:

1. All documents pertaining to current financial year and for one preceding financial year shall be maintained on server and Backup be maintained on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.
2. Back up of all documents pertaining to the period prior to one preceding financial year shall also be maintained on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

12. DESTRUCTION OF DOCUMENTS:

The documents specified in Annexure A which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads. Any deviation will be approved by the Chief Financial Officer.

13. DISSEMINATION OF THE POLICY:

The approved Policy shall be uploaded on the Company's website, www.chaitanyaindia.in and circulated to all Branches, regional and divisional offices and to the accounts department.

14. GENERAL:

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company from time to time.

15. REVIEW OF POLICY:

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this Policy shall be approved by the Board of Directors.

ANNEXE A: RECORDS AS PER COMPANIES ACT, 2013

| Sr. No. | Record Type | Preservation Period |
|----------------|---|----------------------------|
| 1. | Memorandum and Articles of Association | Permanent |
| 2. | Certificate of Incorporation | Permanent |
| 3. | Minutes of Board and Committee Meetings | Permanent |
| 4. | Minutes of Shareholders' Meetings | Permanent |
| 5. | Register and Index of Members | Permanent |
| 6. | Resolutions passed by circulation | 8 Financial Years |
| 7. | Listing Agreement executed with the stock exchanges | Permanent |
| 8. | Attendance Register – Board and Committee Meetings | 8 Financial Years |
| 9. | Register of investments in securities not held in the name of the Company | Permanent |
| 10. | Register of renewed and duplicate certificates | Permanent |
| 11. | Register of contracts in which Directors are interested | Permanent |
| 12. | Register of Directors, Managing Director, Manager and Secretary | Permanent |
| 13. | Register of Directors' Shareholding | Permanent |
| 14. | Register of Inter-corporate loans and investments | Permanent |
| 15. | Register of transfer of shares | Permanent |
| 16. | Register of Transmission of shares | Permanent |
| 17. | Forms filed with Registrar of Companies (ROC) | Permanent |
| 18. | Notice and Agenda of the Board and Committee Meetings | 8 Financial Years |
| 19. | Notices pertaining to disclosure of Interest by the Directors | 8 Financial Years |
| 20. | Annual Returns | 8 Financial Years |
| 21. | Correspondence with shareholders | 8 Financial Years |
| 22. | Disclosures under SEBI – Substantial acquisition of shares and Takeovers, Regulations | 8 Financial Years |
| 23. | Disclosures under SEBI – Prohibition of Insider Trading Regulations | 8 Financial Years |
| 26. | Postal Ballot forms | 8 Financial Years |
| 27. | Scrutinizer's Reports on voting at General Meetings/ Postal Ballot | 8 Financial Years |
| 28. | Newspaper cuttings of notices of Board Meeting and Financial Results | 8 Financial Years |
| 29. | Investor meet presentations | 8 Financial years |

Accounts and Finance Records

| Sr. No. | Record Type | Preservation Period |
|----------------|---|--|
| 1. | Annual Audited and Financial Statements | Permanent |
| 2. | Books of Accounts, Ledgers & Vouchers | 8 Financial Years |
| | a) Disbursal Records | Disbursal Sheet / Corresponding Vouchers in Physical and E-Form for 8 Financial Years. Receipts / Vouchers Issued to Clients for Fees etc to be kept in Physical form for 8 years. |
| | b) Repayment Records | Repayment Sheets in Physical Form with Signature of Clients for 8 years capturing Full Center Repayment. Receipt issues to |

| | | |
|----|---|--|
| | | Centers and Clients in Electronic Form for 8 years in physical form using thermal paper for 3 months. |
| | c) All other Cash and Bank Transaction Vouchers | Electronic form for all JV and Cash Bank Entries internal to the organization Physical Vouchers for all Inflow and Outflow from Company to External agencies for 8 years. |
| 3. | Investment Records | 8 Financial Years from the date of redemption |
| 4. | Engagement letters from Auditors | 8 Financial Years |

| Tax Records | | |
|--------------------|---|----------------------------|
| Sr. No. | Record Type | Preservation Period |
| 1. | Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return. | 8 Financial Years |
| 2. | Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax | 8 Financial Years |

| NBFC- Preservation of records | | |
|--------------------------------------|---|--|
| Sl. No | Record type | Preservation Period |
| 1. | Necessary records of Transaction | 10 years from the date of transaction |
| 2 | Loan Agreements and Loan Documents | After Completion and Closure of the loan all documents excluding Loan Agreement, including loan application, information collection documents, KYC documents etc may be returned to the Customer or Extinguished. Scanned copies of KYC to be maintained in the SYSTEM for all these Customers. Only Signed Loan Agreement between customer and company to be preserved for 10 years. |
| 2. | KYC documents- proof of identification of the customers and their address (hard or soft copy) | Preserved for at least Ten years after the business relationship is ended. KYC documents for all customers which are not in Soft copy to be preserved for 10 years. However, for all customers with Scanned KYC documents in soft form physical Preservation is not necessary. All new Customers will move to Soft Copy of KYC documents from Jan 2018 and older customers KYC will be converted to Soft Copy at the time of loan Closure. |
