



Chaitanya

**Policy on Preservation of Documents
of
Chaitanya India Fin Credit Private Limited**

Document Metadata

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Table of Contents

1	Preamble.....	4
2	Objective of the policy.....	4
3	Definitions.....	4
4	Interpretation.....	5
5	Preservation of documents	5
6	Modes of preservation	6
7	Authenticity.....	6
8	Roles & responsibilities.....	6
9	Disposal of Documents	6
10	Archival Policy	6
11	Amendment	7
12	Policy review	7
13	Disclosure.....	7
14	Annexure A.....	8
15	Annexure B.....	9
16	Annexure C.....	10



1 Preamble

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 ("SEBI LODR") as amended from time to time, Chaitanya India Fin Credit Private Limited "the Company" is required to formulate a policy for preservation of documents in at least two categories as specified in the said Regulation, either in Physical Mode or Electronic Mode

Accordingly, the Board of Directors of the Company has adopted the policy for preservation of documents.

2 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 understand their obligations in retaining and preserving documents and records.

3 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"** shall mean "Chaitanya India Fin Credit Private Limited".
- d) **"Current"** means running matter or whatever is at present in the 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, SEBI Act or any other laws.
- j) **"Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

4 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 as amended from time to time.

5 Preservation of documents

As per Regulation 9 of SEBI LODR, the Company shall have a policy for preservation of documents, approved by the Board of Directors classifying the documents into two categories as follows:

- a. Documents whose preservation shall be permanent in nature (**Annexure – A**)
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions (**Annexure – B**)

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

- 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 A, B and C**.

6 Modes of preservation

The Documents as mentioned above may be preserved either in Physical form or Electronic Form. 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.

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.

7 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.

8 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 each of them, in terms of this Policy.

9 Disposal of Documents

The documents specified in Annexure - B & C which are not required to be maintained and preserved permanently, may be destroyed / disposed of by shredding or any other mode, after the expiry of the specified retention period in such mode and under the instructions of the relevant functional/ departmental heads.

10 Archival Policy

The events or information of the Company disclosed to the stock exchanges (the "Disclosed Information") where the securities of the Company are listed, shall be hosted on the website of the Company i.e. <https://www.chaitanyaIndia.in/policies/> and the same shall be available for a minimum period of five years from the date of each such disclosure ("Mandatory Hosting Period").

Beyond the Mandatory Hosting Period, the Disclosed Information shall be archived for a further period of three years ("The Archival Period").

11 Amendment

The Board shall have the right to amend any part of this Policy from time to time or withdraw the Policy, at any time, as it deems fit, and the decision of the Board shall be final and binding in this regard.

12 Policy review

The policy will be subject to review at least once in two years unless amended, modified, or supplemented from time to time to ensure compliance with any modification/amendment to any laws, rules, regulations or regulatory guidelines as prescribed.

13 Disclosure

This policy as amended from time to time shall be made available on the website of the Company i.e <https://www.chaitanyaIndia.in/policies/>

Annexure – A

List of documents / records whose preservation shall be permanent in nature includes the below:

1. Certificate of Incorporation;
2. Memorandum and Articles of Association;
3. Minutes Books of Board meetings, General meetings and Committees meetings as per Companies Act and as per applicable Secretarial Standards;
4. Register and Index of Members, debenture-holders, or other security holders, if any;
5. Register of Contracts as per Companies Act;
6. Register of Charges as per Companies Act;
7. Register of Investment as per Companies Act;
8. Authorization, Licenses, Certificates obtained from any Statutory Authority under any applicable laws;
9. Policies of the Company framed under various regulations;
10. Agreements entered into by the Company with Stock Exchanges / Depositories etc;
11. Annual reports of the Company;
12. Signed Audited Financial statement;
13. Pan Card & TAN;
14. GST/Service tax/Vat registration certificates;
15. Order issued by tax Authorities;
16. Courts order issued if any;
17. Agreements with debenture Trustees;
18. Certificate of registration under Employees Provident Funds & Miscellaneous Provisions Act 1952;
19. Certificate of registration under Employees State Insurance Act 1948 and
20. Such other records as may be required under any law from time to time

Annexure B

List of documents / record to be preserved for the minimum period of eight years includes the below:

1. Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act;
2. Annual Returns as per Companies Act;
3. Register of Deposits, Register of Allotment (from the date of each allotment) as per Companies Act;
4. Books of accounts including Vouchers and Vouchers register (including vendor agreements) as defined under the Companies Act, IncomeTax and GST;
5. Income Tax Returns filed under Income Tax Act, 1961;
6. All notices in form MBP-1 received from Directors and KMPs along with any amendment thereto;
7. Return of declaration in respect of beneficial interest in any share as per Companies Act;
8. Copy of newspaper advertisement or publications;
9. Compliance Reports received from any statutory authority;
10. The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means;
11. Disclosure/Return filed under SEBI LODR Regulations;
12. Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers;
13. Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM);
14. Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act and/or the SEBI LODR Regulations or any other laws;
15. Auditors' reports (Internal/Tax);
16. Returns filed under respective State/Municipal Professional Tax Act and
17. Returns filed under respective Labour Welfare Funds Act.

Annexure – C

List of documents / records to be preserved other than those mentioned in Annexure A and B includes the below:

1. Maintain all necessary records of transactions between the Company and the customer, both domestic and international, for at least five years from the date of transaction.
2. Preserve the records pertaining to the identification of the customers and their addresses obtained while opening the account and during the course of business relationship, for at least five years after the business relationship is ended.
3. Documents 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;
4. Documents to be preserved and retained for such period as prescribed under any act, law, statute, circular or regulation as applicable to the Company.
5. If there is no requirement specified in any applicable law, then for such period as the document pertains to a matter which is "Current".