Svatantra

POLICY ON PRESERVATION OF DOCUMENTS

Svatantra

Legal and Secretarial

Svatantra Microfin Limited

Document Metadata

Document Reference

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Document Revision and Change Control

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3.	V1.2	04th March 2022	Reviewed. No changes
4.	V1.3	22nd March 2024	Mode of disposal of documents has been defined.
5.	V1.4	26th September 2024	To harmonize and align the policy with Subsidiary Company
6.	V1.5	22nd July 2026	To align the policy with SEBI Listing Regulations

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1 PREAMBLE

In terms of Regulation 9 of the SEBI Listing Regulations, the Company is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations 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

"Companies Act" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

"Board" means board of directors of the Company as constituted from time to time.

"Company" means Svatantra Microfin Limited.

"Current" means running matter or whatever is at present in the course of passage.

"Document(s)" includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

"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.

"Maintenance" means keeping documents, either physically or in electronic form.

"Policy" means this policy on preservation of documents formulated by the Company.

"Preservation" means to keep the documents preventing them from being altered, damaged or destroyed.

"Register" means a register maintained under the Companies Act, 2013, SEBI Act or any other laws.

"SEBI Listing Regulations" shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

4 PRESERVATION OF DOCUMENTS

As per Regulation 9 of SEBI Listing Regulations 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)**;

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company;

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.**

5 MODES OF PRESERVATION

- The documents as mentioned above may be preserved either in physical form or electronic form

- The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which 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 authorised person for preservation, to ensure integrity and confidentiality of the Documents and prohibit unauthorized access.

6 AUTHENTICITY

Where a document is being maintained both in physical form and electronic form, the physical form should be considered authentic for every purpose.

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 each of them, in terms of this Policy.

8 DISPOSAL OF DOCUMENTS

The documents specified in **Annexure – B & C** which are not required to be maintained and preserved permanently, may be destroyed / disposed off by shredding after the expiry of the specified retention period in such mode and under the instructions of the relevant functional/ departmental heads. The details of Documents destroyed /disposed off by the Company shall be recorded in the register of disposal of records.

Notwithstanding the foregoing, accidental loss or destruction of Documents due to events beyond the control of the Company, including but not limited to fire, flood, natural disasters or technological failure, shall not constitute a breach of this Policy, provided that the Company has taken reasonable precautions to prevent such loss, including by maintaining digital backups where practicable.

9 COMPLIANCE

All employees of the Company are required to comply with the provisions of this Policy. Failure to comply by any employee of the Company with this Policy may result in disciplinary action by the Company, including suspension or termination of employment.

Any queries regarding this Policy may be referred to the Company Secretary and Compliance Officer of the Company, or such other officer as may be designated by the Board from time to time, 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 will take precedence over this Policy.

11 REVIEW AND AMENDMENT

The policy will be subject to review after a period of two years. This Policy may be amended, modified or supplemented by the Board, from time to time, to ensure compliance with any amendment, modification or supplementation to the Companies Act, 2013, SEBI Listing Regulations and any other guidelines issued by the regulatory authorities or as may be otherwise

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions in this Policy and this Policy shall stand amended accordingly.

The Board may issue/implement such guidelines, procedures, formats and/or reporting mechanisms to enforce this Policy as it may deem fit.

The policy shall be disclosed on the website of the Company.

Annexure – A

List of documents / record whose preservation shall be permanent in nature:

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 obtained from any Statutory Authority ;
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 issue 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:

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;

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;

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.

18. Any protected disclosure in writing or documented along with the results of investigation under Vigil Mechanism (Whistle Blower Policy) received by the Company.

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".