SAMUNNATI FINANCE PRIVATE LIMITED	
POLICY	Policy on Preservation of Documents
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Policy on Preservation of Documents

1. PREAMBLE

This Policy deals with the retention and archiving of the corporate records of Samunnati Finance Private Limited ("SFPL") in accordance with the Reserve Bank of India Act, 1934 and the rules, regulations, directions, circulars and guidelines issued by the Reserve Bank of India, Companies Act, 2013 along with Rules made thereunder and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. BACKGROUND

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations") requires Samunnati Finance Private Limited ("SFPL") to frame a policy on Preservation of Documents which duly approved by the Board of Directors.

3. OBJECTIVE

The purpose of this Policy is to ensure that the all the necessary documents and records of SFPL are adequately protected and preserved as per the statutory requirements. This policy shall cover all business records of the SFPL, including written, printed, and recorded matter and electronic forms of records.

The objective of the Policy is to classify the documents, records, and registers of the SFPL which are required:

i) To be preserved permanently and

ii) To be preserved for a period of not less than eight years after completion of the relevant transactions

4. GOVERNING LAWS

This Policy shall be governed by the Companies Act 2013, Reserve Bank of India Act, 1934 and the rules, regulations, directions, circulars and guidelines issued by the Reserve Bank of India, Securities

and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and other applicable regulations, circulars, guidelines, and directions, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

5. SCOPE

This policy shall govern preservation of documents, records, and registers of the SFPL as per applicable statutory and regulatory requirements.

6. PRESERVATION OF DOCUMENTS

SFPL shall preserve all its documents as per the requirements and provisions of the Reserve Bank of India Act, 1934 and the rules, regulations, directions, circulars and guidelines issued by the Reserve Bank of India, Companies Act, 2013 and the rules & regulations made thereunder, Secretarial Standards issued by the Institute of Company Secretaries of India, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and other applicable regulations, circulars, guidelines, and directions and any other law, rules, regulations as may be applicable to SFPL from time-to-time.

The Minimum Retention Requirement of the different categories of SFPL records is provided in the Retention Schedule which is disclosed by way of Annexure to this Policy.

7. MODE OF PRESERVATION

The SFPL shall preserve these records either in physical or electronic mode. The Applicable provisions of law, rules, and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be preserved as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

8. CUSTODY OF DOCUMENTS

All documents shall be under the custody of respective departments as detailed below:

Sl. No.	Documents	Authorised Department
1	Tax / Accounting Records / Financial Statements	Finance and Accounts
2	Board and Committee Minutes / Statutory Registers	Secretarial
3	Employment / Personnel Records / / Contracts	Human Resources
4.	Lease Documents	Infra and Admin
5	Customer Transaction documents & KYC documents	Business Process
5	Legal Documents (Correspondence with Courts/ other statutory bodies regarding any petition/ case/suit etc.)	Legal Department
6.	RBI Related Communications	Compliance
6	Intellectual Property	Branding
7.	Loan Agreements, Hypothecation Agreements, Sanction Letters, Personal/Corporate guarantees, Power of Attorneys, Indemnity with Customers/Borrowers along with any other related documents	Credit Department/ Credit Administration

9. DISPOSAL AND DESTRUCTION OF RECORDS

After the expiry of the statutory retention period the preserved documents may be destroyed in such a mode under any instructions duly approved by the Head – Operations and the Head - Riski. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

a. Recycle non-confidential paper records.

b. Shred or otherwise render unreadable confidential paper records; or

c. Delete or destroy electronically stored data.

10. GENERAL

i, Documents which are required to be mandatorily maintained and preserved by the SFPL shall be preserved for such duration as may be specified by the relevant statute or regulation, as the case may be.

As a step to ensure business continuity, function heads shall ensure that all documents pertaining to the function, except those that are highly confidential in nature, are stored in a common drive accessible to all team members.

ii. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.

iii. All the documents, records that are statutorily required to be hosted on the website of SFPL as per SEBI regulations or other applicable law, shall be hosted on the website for a minimum period of five (5) years or for such period as may be mentioned in the relevant law, whichever is longer.

iv. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

11. RESPONSIBILITY

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

12. REVIEW AND AMENDMENTS TO THE POLICY

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the Statutory Provisions and remains effective.

This Policy shall be reviewed periodically and may be amended by the Board of Directors of SFPL, as may be deemed necessary.

Annexure- Retention Schedule

SL.No.	Record Category	Record Type	Retention Requirement
1	Board Meeting & Committee Meeting records	1. Minutes of the meeting of Board of Directors and Committee constituted by the Board and Recordings of the Meetings	Permanent
2	General Meeting records	Register & Index of members General Meeting Minutes	Permanent
3	Other Secretarial Records	. Incorporation / Conversion/ Business commencement Certificates. . Memorandum of Association & Articles of Association. . Various Statutory Registers pursuant to the Companies Act, 1956 and/or Companies Act, 2013. . Share Transfer, transmission forms, etc., correspondences with the Registrar & Share Transfer Agent.	Permanent
		Non-statutory Registers under the Companies Act, 1956 and/or Companies Act, 2013 Attendance register of Board of Directors Meeting and General Meetings Office copies of Notices, Agenda, Notes on Agenda and other related papers of Meetings	8 years from the Financial Year in which the latest entry is made. 8 years from the Financial Year in which the latest entry is made 8 years from the date of transaction of business

		Copies of all annual returns along with certificates & documents required to be annexed thereto. along with other ROC Filings.	8 years from the date of filing with the Registrar.
4	Insurance records	1. Copies of Insurance Policies, Renewal Certificate 2. Insurance Claims under various Policies 3. Group Insurance Plans- Active Employees,	For Policies with no claim – 3 years from the lapse of the Policy For Policies in respect of which claim is preferred – 5 years from the date of settlement of the claim. Group insurance for Active employees should be preserved for 8 years.
5	Contracts/ Agreements/ Purchase Orders	Renewal, Modification, Termination of Contracts/ Agreements/ Purchase Orders	8 years from termination of Contract/ Agreement/ completion of purchase.
6	Loan Agreements with the Clients	1. Loan Agreement and other related documents and Loan Modification 2. Loans involving mortgage of property 3. Title Deeds deposited by borrowers	8 Years 12 Years Permanent till the customer takes it back.
7	SEBI & Stock Exchange Records	Listing Agreement 2. Statutory Returns/ Reports etc. submitted from time to time	Permanent 8 years
		1. License Certificate/ Renewal Certificate 2. Client Records & transactions pursuant to the 'Know Your Customer'	Permanent

8	RBI Records	(KYC) Guidelines–Anti Money Laundering Standards (AML) 3. 'Preservation of Records pertaining to the identification of the customers and their address (e.g. copies of documents like passports, identity cards, driving licenses, PAN card, utility bills, etc.) obtained while opening the account and during the course of business relationship. 4. Records pertaining to complex, unusual, large transactions and all unusual patterns of transactions, which have no apparent economic or visible lawful purpose. 5. Statutory Returns/ Reports etc. submitted from time to time.	8 years after completion of the relevant transactions 8 years after the business relationship ended. 8 years after the business relationship ended. 8 years after the business relationship ended. 8 years
9	Misc Licenses obtained from Statutory Authorities	-	Permanent
10	Property Records	Agreements/ Contracts Documents relating to acquisition and sale of Real Property, Property Deeds, Assessments	Permanent

11	Legal Documents	Correspondence with Courts/ other statutory bodies regarding any petition/ case/suit, etc. Legal Memoranda and Opinions	5 years from the date of decree 8 years after Closure of Matters
12	Personnel Records	Official Personnel Files of Active Employees	To be retained during active employment
		Retirement and Pension Records	Permanent
		Official Personnel Files of inactive Employees	3 years from the date of termination of employment.
		Employee Medical Records, Employee Earnings Records, Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training, and qualification records, enquiry related papers, Correspondence with Employment Agencies and Advertisements for job Openings	3 years after termination of service of employment
13	Labour Law records	1. Registration/ Renewal Certificate under various Acts relating to Labour laws. 2. Maintenance of various Registers under the various acts in force read with the Rules made thereunder, relating to Labour laws.	Permanent 3 years or such period as may be prescribed from time to time

14	Finance	Audited Financial Statements Auditors Reports Books of Accounts & Vouchers	8 financial years following the relevant Financial Year. In cases where books and vouchers are subjects of enquiry, the relevant documents shall be kept till the expiry of 3 years after the final resolution of the enquiry.
15	Taxation	1.Registration/Amendment Certificates, Tax-Exemption Documents and related Correspondences, Tax Returns – Income, Property	Permanent
		Preservation of specific books of accounts Tax work paper packages - Originals	8 financial years following the relevant Financial Year. In cases where books and vouchers are subjects of enquiry, the relevant documents shall be kept till the expiry of 3 years after the final resolution of the enquiry.
16	Other documents not covered herein above	Records pertaining to various other laws in force	As required under various other laws in force, from time to time.
17	Ledgers and Registers	Cheque Book Registers FRFC/ Vault Registers	5 Years