



IIFL Samasta Finance Limited
Policy on preservation of the Documents

[Pursuant to SEBI (Listing Obligations and Disclosure Requirement), 2015]

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1. Preamble

Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”), mandates the listed Company to adopt a Board approved policy for preservation of Documents. This policy would ensure Safe-keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, makes this policy, in pursuance to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

2. Definitions –

- 2.1 **“Act”** means the Companies Act, 2013.
- 2.2 **“Applicable Law”** means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents.
- 2.3 **“Authorized Person”** means any person duly authorized by the Board.
- 2.4 **“Board”** means the Board of directors of the Company or its Committee.
- 2.5 **“Company”** means Samasta Microfinance Limited.
- 2.6 **“Current Document(s)”** means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- 2.7 **“Document(s)”** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.
- 2.8 **“Electronic Record(s)”** means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- 2.9 **“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.

2.10 **“Maintenance”** means keeping Documents, either physically or in Electronic Form.

2.11 **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

2.12 **“Regulations”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

3. Effective

This policy shall be effective from the date as and when approved by the board of Directors of the Company.

4. Coverage

This Policy is intended to guide the Company and its officer on maintenance of any Documents, their preservation and disposal.

5. Classification

The preservation of Documents shall be done in the following manner:

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is “Current”.
- c) In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance; Provided that generally speaking, a Document may be preserved for a period of 3 years from the date on which the Document was originated.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure- I

6. Modes of preservation

The Documents may be preserved either in physical form or Electronic Form or both as may be decided by the Authorised Person. The Preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

7. Custody of the Documents

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tender's resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

8. Destruction of Documents

- 8.1 Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.
- 8.2 Document which are required to preserved under the applicable law shall be destroyed after the expiry of such period, in such manner and after obtaining such approval as prescribed under the said law.
- 8.3 The other Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored.

9. Interpretation

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this Policy is changed to conform to the law, rule, Regulation or standard.

Annexure – I

➤ *Indicative list –

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
<u>Companies Act, 2013</u>	
<ul style="list-style-type: none"> • The memorandum and articles of the company • Affidavit from the subscribers to the memorandum and from persons named as the first directors • Register of members • Books and Documents relating to the issue of share certificates, including the blank forms of share certificates • Annual return • The foreign register of members • Minutes book of general meeting 	<ul style="list-style-type: none"> • Register of charges (8 years) • Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities) • Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar) • Foreign register of debenture holders or any other security holders (8 years from the date of Redemption) • All notices pertaining to disclosure of interest of directors • All certificates surrendered to a company (3 years from date of surrender) • Register of deposits (not less than 8 years from the date of last entry) • Instrument creating a charge or modification (8 years from date of satisfaction of charge)
<u>Secretarial Standard</u>	
<ul style="list-style-type: none"> • Minutes of Board meeting (SS-1) 	<ul style="list-style-type: none"> • Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2)
	<ul style="list-style-type: none"> • Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 10 years or as long as they remain current.
<p>*This list is an indicative list only and may include other documents as prescribed by applicable law amended from time to time or may considered the changes as per applicable law without any approval.</p>	

