

ASIRVAD MICRO FINANCE LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

Approval Details:

Approval Date	February 02, 2019
Effective Date	February 02, 2019
Approved by	Board of Directors
Version	Sec-4.0
Policy Owner	Secretarial Department

Review/ Amendment History:

Review/ Amendment Date	Amendment - January 23, 2020 Review- July 24, 2020 Amendment -November 12, 2021 Amendment- January 31, 2023
Initiated by	Company Secretary
Recommended by	Managing Director
Approved by	Board of Directors

**Introduction:**

Regulation 9 of the SEBI (Listing Obligation and Disclosures Requirements) Regulations, 2015 requires the Board of Directors of listed Companies to frame a policy for providing framework for protection and preservation of the documents of the Company.

Accordingly, the Board of Directors of Asirvad Micro Finance Limited (AMFL / Company) has adopted the Policy for Preservation of Documents.

**Definitions:**

**“Applicable Law”** means any law, rules, regulations, circular, guidelines issued by the Securities Exchange Board of India ( SEBI) , Ministry of Corporate Affairs (MCA), ICSI, ICAI and other statutory or professional bodies under which the preservation of documents has been prescribed.

**“Board of Directors”** or Board means the Board of Directors of Asirvad Micro Finance Limited.

**“Company”** means Asirvad Micro Finance Limited

**“Documents”** refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, undertakings, disclosures, forms, minutes, registers, correspondences, challan 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.

**“Listing Regulation”** means SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015.

**“Policy”** means Policy for Preservation of Documents.

**Preservation of Documents:**

- A) Documents as per Annexure A and those which are required to be obtained under various Acts/ Rules/ Regulations/ Statutes/ Laws applicable to the Company shall be maintained and preserved as per the provisions contained therein.
- B) The respective functional/ departmental heads of the Company shall be responsible for maintenance, updation and preservation of documents in respect of the areas falling under the charge of each of them, in terms of policy.
- C) The documents mentioned in Annexure- A can be maintained by the Company in physical and electronic or digital mode, if permitted under the applicable Acts, Rules, law and Regulations.

**Destruction of Policy:**

- A) 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.
- B) In case of any specific procedures is prescribed under the applicable Act/ Rules/ Regulations/ Statutes/ Laws for destruction of the documents, the same shall be followed by the functional/ departmental heads.
- C) Where the Company has been served with any notice requisitioning documents from any of the Statutory Authorities or any litigation is commenced by or against the Company, in such case the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed of finally.

**Amendment:**

The Board of Directors of the Company reserve the right to amend or modify this policy in whole or in part, as may be required, at any point of time.

## Annexure- A

Sr No	Concerned Department	Records	Preservation Period
1	Secretarial	MOA & AOA	Permanent
		Certificate of Incorporation, Statutory Registers	
		Registers of Members	
		Secretarial Audit Reports	
		Register of Contracts where directors are interested.	
		Minutes of the Board of Directors and its Committees	
		Minutes of all meeting of Shareholders	
		Statutory filings with the Stock Exchanges, SEBI, Ministry of Corporate Affairs, Reserve Bank of India and any other statutory/ regulatory authority (All are in electronic mode)	
		Annual Reports	8 years
		Office copies of Notice of General Meeting and related papers (in electronic mode)	
		Board Agenda & Supporting documents (in electronic mode)	
		General and Board/ Committee Meeting Attendance Register	
		Office copies of Notice of Board Meeting/ Committee Meeting, Agenda, Notes on Agenda and other related papers (in electronic mode)	

		<b>Resolutions passed by Circulation (in electronic mode)</b>	
<b>2</b>	<b>Finance &amp; Account</b>	<b>Books of Accounts (including Cash, Bank, Journal, Receivable/ Payable Ledger, Fixed Assets Register, Investments etc.)</b>	<b>8 years from the end of Financial year of completion or completion of assessment under Income Tax whichever is later</b>
		<b>Income Tax related records</b>	
		<b>GST related documents</b>	<b>8 years from the end of Financial year of completion or completion of assessment under GST whichever is later</b>
		<b>Insurance Policies (Master Policies/Endorsement/Renewal)</b>	<b>Three Years</b>
		<b>Certificate of Registration issued by Regulators (Income Tax/GST etc). Annual Audit Report and Financial Statements</b>	<b>Permanent</b>
<b>3</b>	<b>HR</b>	<b>Personal E-file (Electronic form of personal file)</b>	<b>7 yrs from Exit (Only electronic preservation with restricted access to HR team) both at State office and Head Office.  Physical form of personal file is kept in Head office. Access is restricted to Head of HR.</b>
		<b>Personal Records on employee movements: - -Re-designation</b>	<b>Till his Last Working Day (Only Electronic preservation with restricted access to HR team)</b>

		-Transfer -Promotion	
		Personal Records on action on employee <ul style="list-style-type: none"> <li>- Show cause letter</li> <li>- Warning</li> <li>- Termination</li> <li>- Advisory</li> </ul>	Till his Last Working Day (Only Electronic preservation with restricted access to HR team)
		HR Policies	Till next review (Electronic preservation)
		HR Circular	7 Yr. (Electronic preservation)
<b>4</b>	<b>Information Technology</b>	Information & Cyber Security Policy	Eternal
		Technology Usage Policy	Eternal
		IP Address and Host Name Policy	Eternal
		Cyber Crisise Management Plan	Eternal
		Change Management Procedure	Eternal
		Risk Register	Eternal
		Business Continuity Policy	Eternal
		Information Asset Management Policy	Eternal
		IT Infrastructure Security Policy	Eternal
		Stationery Stock Register	One Year
		Courier IN/OUT Register	One Year
		Visitors' Register	One Year

5.	Operations	KYC, Loan Documents, Application Form, Loan Card etc	7 years
----	------------	--	---------