

POLICY ON PRESERVATION OF DOCUMENTS

1. INTRODUCTION

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), the Board of Directors (the “**Board**”) of Finkurve Financial Services Limited has adopted the Policy on Preservation of Documents at its meeting held on 3rd November, 2015, as required under applicable regulations.

2. OBJECTIVES

To determine preservation period for records / documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Company’s own information retrieval needs (reference value)
- Statutory requirements under respective statutes.
- Litigation requirements.
- To ensure easy retrieval.
- To ensure that unwanted records do not occupy storage space.

3. DEFINITIONS

- a. “**Act**” means the Companies Act, 2013 and rules made there under, as amended from time to time.
- b. “**SEBI Regulations**” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- c. “**Company**” means Finkurve Financial Services Limited.
- d. “**Document**” includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.
- e. “**Key Managerial Personnel**” or “**KMP**” shall have the same meaning ascribed to it under the Act.
- f. “**Board**” or “**Board of Directors**” shall mean the Board of Directors of Finkurve Financial Services Limited.
- g. “**Financial Year**” shall have the same meaning ascribed to it under the Act.
- h. “**Electronic Form**” with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device, 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.
- i. “**Electronic Record(s)**” means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- j. “**Maintenance**” means keeping Documents, either physically or in Electronic Form.
- k. “**Preservation**” means to keep in good order and to prevent from being altered, damaged or destroyed.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Listing Regulations shall have the same meaning assigned therein.

4. SCOPE

These guidelines will be valid for determining preservation period for commercial and legal records; and will be applicable to all locations of the Company. This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

5. RESPONSIBILITY

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

The Policy is effective from 1st December, 2015.

6. PRESERVATION PERIOD

- A. Documents whose preservation shall be permanent in nature;
- B. Documents with preservation period of less than eight years / eight to twelve years as may prescribed under applicable laws for the time being in force after completion of the relevant transactions.
- C. Further in case where applicable laws governing the Company have not prescribed any period for preservation of documents, then such documents will be preserved up to the period as per the practices followed by the Company for preservation of documents.

The list of documents required to be preserved permanently and those to be preserved for less than eight years / eight to twelve years immediately preceding a financial year as may prescribed under applicable laws for the time being in force governing the Company including Listing Regulations, Companies Act, 2013, Rules thereunder, Secretarial Standards, Income Tax Act etc. are as under:

A. LIST OF DOCUMENTS TO BE PRESERVED PERMANENTLY

Sr. No.	Nature of documents	Tenure of preservation	Reference
1)	Incorporation Documents: All Documents and Information as originally filed with ROC For Incorporation of Company.	Permanent	Section 7 (1) of the Companies Act, 2013
2)	Memorandum & Articles of Association filed with ROC, duly updated from time to time	Permanent	Section 15 of the Companies Act, 2013
3)	Register of Renewed and Duplicate Share Certificate	Permanent	Rule 6(3)(b) of The Companies (Share Capital and Debentures) Rules 2014.

4)	All books and documents relating to the issue of share certificates, including the blank forms of shares	Not less than thirty years and in case of disputed cases , shall be preserved till final settlement of dispute	Rule 7(3) of the Companies (Share Capital and Debentures) Rules, 2014.
5)	Register of Charges	Permanent	Section 85 of the Companies Act, 2013 and Rule 10(4) of the Companies (Registration of Charges) Rules, 2014.
6)	Register of Members including Index	Permanent	Section 88 of the Companies Act, 2013 and Rule 15(1) of the Companies (Management and Administration) Rules, 2014.
7)	Minutes of all Board and Committee Meetings	Permanent	Rule 25(1)(f) of Companies (Management and Administration) Rules, 2014 and Secretarial Standard – 1.
8)	Minutes of all General Meetings.	Permanent	Rule 25(1)(e) of Companies (Management and Administration) Rules, 2014 and Secretarial
9)	Register of Directors & Key Managerial Personnel and their Shareholding	Permanent	Section 170(1) of the Companies Act, 2013
10)	Register of Contract or Arrangements in which Directors are interested	Permanent	Section 189(1) of the Companies Act, 2013 and Rule 16(3) of the Companies (Meetings of Board and its Powers) Rules, 2014.
11)	Register u/s 186(9) of Companies Act, 2013	Permanent	Section 186(9) of the Companies Act, 2013 and Rule 12(3) of the Companies (Meetings of Board and its Powers) Rules, 2014.

12)	Register of Investment made by a Company held not in its name	Permanent	Section 187(3) of the Companies Act, 2013 and Rule 14(3) of the Companies (Meetings of Board and its Powers) Rules, 2014.
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B. LIST OF DOCUMENTS TO BE PRESERVED FOR LESS THAN 8 YEARS / 8 YEARS TO 12 YEARS IMMEDIATELY PRECEDING A FINANCIAL YEAR

Sr. No.	Nature of documents	Tenure of preservation	Reference
1)	Attendance Register for Board and Committee Meetings	For a period of at least 8 financial years and may be destroyed thereafter with the approval of the Board.	Secretarial Standard – 1 No.4.1.7
2)	Register of Deposits.	For a period of not less than 8 years from the financial year in which the latest entry is made.	Section 73 of the Companies Act, 2013 Rule 14 (3) of The Companies (Acceptance of Deposits) Rules, 2014
3)	The Instrument creating Charge or Modification thereon.	For a Period of 8 years from the date of Satisfaction of Charge	Section 85 of the Companies Act, 2013 and Rule 10(4) of The Companies (Registration of Charges) Rules 2014
4)	Register of Debenture holders or Security holders for each type of Debenture or other Securities along with the Index.	For a period of 8 years from the date of redemption	Section 88 of the Companies Act, 2013 and Rule 15(2) of The Companies (Management and Administration) Rules, 2014
5)	Copies of Annual Returns alongwith copies of all certificates and documents required to be annexed thereto.	For a period of 8 years from the date of filing with ROC	Section 88 and Rule 15(3) of The Companies (Management and Administration) Rules, 2014
6)	Office copies of Notices, Agenda, Notes on Agenda and other related papers - Board & Committee Meetings	In good order in physical or electronic form as long as they remain current or for 8 financial years, whichever is later and may be destroyed thereafter with the approval of the Board	Secretarial Standard – 1 No.8.2

8)	Office copies of Notices, scrutinizer's report, and related papers (General Meetings)	In good order in physical or in electronic form for as long as they remain current or for 8 financial years, whichever is later and may be destroyed thereafter with the approval of the Board.	Secretarial Standard – 2 No.18.2
9)	Books of Account etc.	<p>1. In good order for a period of not less than 8 financial years immediately preceding a financial year together with the vouchers relevant to any entry in such Books of Account.</p> <p>2. As per Rule 6F of Income Tax Rules, 1962 the Books of Account and other documents specified in sub-rule (2) and sub-rule (3) shall be kept and maintained for a period of six years from the end of the relevant assessment year. Hence, the Books of Account etc. together with the vouchers relevant to any entry in such Books of Account and other documents specified in sub-rule (2) and sub-rule (3) of Rule 6F of Income Tax Rules, 1962 will be preserved for a period of not less than 8 financial years immediately preceding a financial year.</p> <p>Note : However, Books of Account etc. will be preserved beyond the period of 8 years immediately preceding a financial year where Income Tax / ROC / Statutory Authority/Judicial proceedings etc. are pending, till completion and final adjudication / disposal / settlement of such proceedings</p>	<p>Section 128 (5) of the Companies Act, 2013</p> <p>Income Tax Rules, 1962</p>
10)	Disclosures/ Notices by a director of his interest	For a period of eight years from the end of the financial year to which it relates	Rule 9(3) of The Companies (Meetings of Board and its Powers) Rules, 2014

11)	All certificates surrendered to a company shall immediately be defaced by stamping or printing the word cancelled in bold letters	Certificate may be destroyed after the expiry of three years from the date on which they are surrendered, under the authority of a resolution of the Board and in the presence of a person duly appointed by the Board in this behalf.	Rule 7(3) of The Companies (Share Capital and Debentures) Rules, 2014.
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C. Further in case where applicable laws governing the Company have not prescribed any period for preservation of documents, then such documents will be preserved up to the period as per the practices followed by the Company for preservation of documents.

Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government / Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

Notwithstanding the general guidelines, care should be taken by the respective department heads to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi-judicial for and other mediation and alternate dispute for industrial disputes, etc. are preserved according to specific needs and even beyond the prescribed period.

7. MODES OF PRESERVATION:

The Documents may be preserved in Physical form or Electronic Form.

The departmental head concerned will be responsible for the preservation of documents / records pertaining to the respective Department. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents. The preserved Documents must be accessible at all reasonable times. Access may be controlled by departmental head with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

8. CUSTODY OF DOCUMENTS:

Subject to the Applicable Law, the custody of the Documents shall be with the departmental head. Where the departmental head tenders 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 departmental head.

9. AUTHORITY FOR APPROVAL AND ALTERATIONS OF POLICY

The Board shall have the authority for approval and alteration from time to time of this policy in pursuance to the Regulations. This authority has been granted *via* the Regulations. However, the condition that such alterations shall be in consonance with the provisions of the Act and Regulations.

10. DESTRUCTION OF DOCUMENTS:

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. The temporary Documents, shall be destroyed after the relevant or prescribed period, by the

Departmental head in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice are listed in **Annexure I**.

A register of the Documents disposed / destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal / destruction and the mode of destruction. The entries in the register shall be authenticated by the Departmental head. **The format of the register has to be in accordance with Annexure II.**

11. CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED:

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space. This will be done after obtaining prior approval of the Board.

12. AUTHENTICITY

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

13. INTERPRETATION

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 this policy until such time as this policy is changed to conform to the law, rule, regulation or standard.

Annexure I

The following categories of Documents may be destroyed as normal administrative practice:

- routine correspondence
- copies of press cuttings, press statements or publicity material
- letters of appreciation or sympathy, or anonymous letters
- requests for copies of marketing, advertising material (subject to Clause 10 and 11 of this Policy)
- facsimiles where a photocopy has been made
- telephone message
- drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 10 and 11 of this Policy) and
- routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 10 and 11 of this Policy)

Annexure II

The format of the register of Documents disposed / destroyed –

PARTICULARS OF DOCUMENT PROVISION OF APPLICABLE LAW ALONGWITH OF	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON