

POLICY ON PRESERVATION OF DOCUMENTS OF

Navi Finserv Private Limited

(Formerly known as Chaitanya Rural Intermediation Development Services Private Limited)



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Amended/Modified Date of Policy	-
Policy owner	Chief Executive Officer
Approved by	Board of Directors
Signature	RIYA BHATTACHARYA Digitally signed by RIYA BHATTACHARYA Date: 2021.02.18 20:35:57 +05'30'

INTRODUCTION

The Securities and Exchange Board of India (SEBI) has issued the Securities and Exchange Board of India ((Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI LODR**”) which have come into force from December 1, 2015. This requires every listed company (which includes companies which have issued listed non-convertible debentures) to put in place a policy on preservation of documents / records maintained by the company either in physical mode or electronic mode.

Accordingly, the Board of Directors of Navi Finserv Private Limited has adopted the Policy for Preservation of Documents, as set out hereunder (“**Policy**”).

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that all the documents, whether in physical or electronic mode, form an important and integral part of the Company’s records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

OBJECTIVES OF THE POLICY

Pursuant to Regulation 9 of the SEBI LODR, documents are required to be classified into two categories:

- documents which will be permanently preserved; and
- documents which will be preserved for a period not less than eight years.

Therefore, the primary object of this Policy is to determine the period for preservation of documents of the Company as well as to ensure that the records no longer needed or which are of no value are discarded after following due process for the same. For this determination, the following aspects have been considered:

- requirements under Applicable Law;
- ease of access to documents;
- optimal use of storage space and cost of preservation; and
- timely sanitation of obsolete records.

APPLICABILITY OF THE POLICY

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The documents should be Preserved in a manner ensuring that there is no tampering, alteration, destruction or anything that 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.

Definitions:

- a. “**Applicable Law**” means all applicable law, rules, circulars, guidelines or regulations applicable to the Company including (i) the Companies Act; and (ii) the circulars, rules and regulations issued by the Securities and Exchange Board of India (SEBI), The Institute of Company Secretaries of India (ICSI) and other professional bodies (which govern the

business of the Company), under which the preservation of documents has been prescribed, each as amended, modified or replaced from time to time.

- b. **“Board”** means the Board of the Directors of the Company.
- c. **“Books of Accounts”** includes records maintained in respect of –
 - i. all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place
 - ii. All sales and purchases of goods and services by the Company
 - iii. The assets and liabilities of the Company; and
 - iv. The items of cost as may be prescribed under section 148 of the Companies Act in case the Company belongs to any class of companies specified under that section.
- d. **“Company”** means Navi Finserv Private Limited.
- e. **“Companies Act”** means the Companies Act, 2013.
- f. **“Documents”** refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, 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.
- g. **“Electronic Form”** means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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.
- h. **“Maintenance”** means keeping documents, either physically or in Electronic Form.
- i. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

All other words and expressions used but not defined in this policy but defined in the Companies Act; the Securities and Exchange Board of India Act, 1992; the Securities Contracts (Regulation) Act, 1956; the Depositories Act, 1996; and/ or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

PRESERVATION POLICY

The Documents required to be prepared and Maintained (in physical or Electronic Form) under the any Applicable Law shall be Preserved for such period and such manner as prescribed under the relevant Applicable Law.

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

- where any Applicable Law specifies the period for which a Document is required to be preserved, such Document shall be Preserved for such prescribed period of time;
- where Applicable Law does not prescribe a requirement for Preservation of a Document, then such Document shall be Preserved for such period as the Document pertains to a matter; and
- in case of any other Document, for such period as the relevant officer of the Company handling or deal with the Document decides taking into account its relevance; provided that

generally, a Document may be preserved for a period of at least 5 years from the date on which the Document was originated.

An indicative list of documents and the time frame of their preservation is provided in the **Annexure**.

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

RESPONSIBILITY

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 the charge of each of them, in terms of this Policy.

ACCESS

The Preserved Documents must be accessible at all reasonable times. Access may be controlled by the concerned authorised person with Preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

DESTRUCTION OF DOCUMENTS:

The documents specified in the Annexure 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. Any deviation will be approved by the Chief Financial Officer.

GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any Applicable law from time to time.

DISSEMINATION OF THE POLICY:

The approved Policy shall be circulated to all directors, employees and officers of the Company. The Policy shall be disseminated on the website of the Company

REVIEW OF POLICY

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this Policy shall be approved by the Chief Executive Officer or Board of Directors.

Annexure

Records as per Companies Act, 2013		
Sr No	Record Type	Preservation Period
1.	Memorandum and Articles of Association	Permanent
2.	Certificate of Incorporation	Permanent
3.	Minutes of Board and Committee Meetings	Permanent
4.	Minutes of Shareholders' Meetings	Permanent
5.	Register and Index of Members	Permanent
6.	Resolutions passed by circulation	8 Financial Years
7.	Listing Agreement executed with the stock exchanges	Permanent
8.	Attendance Register – Board and Committee Meetings	8 Financial Years
9.	Register of investments in securities not held in the name of the Company	Permanent
10.	Register of renewed and duplicate certificates	Permanent
11.	Register of contracts in which Directors are interested	Permanent
12.	Register of Directors, Managing Director, Manager and Secretary	Permanent
13.	Register of Directors' Shareholding	Permanent
14.	Register of Inter-corporate loans and investments	Permanent
15.	Register of transfer of shares	Permanent
16.	Register of Transmission of shares	Permanent
17.	Forms filed with Registrar of Companies (ROC)	Permanent
18.	Notice and Agenda of the Board and Committee Meetings	8 Financial Years
19.	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
20.	Annual Returns	8 Financial Years
21.	Correspondence with shareholders	8 Financial Years
22.	Disclosures under SEBI – Substantial acquisition of shares and Takeovers, Regulations	8 Financial Years
23.	Disclosures under SEBI – Prohibition of Insider Trading Regulations	8 Financial Years
26.	Postal Ballot forms	8 Financial Years

Accounts and Finance Records		
Sr No	Record Type	Preservation Period
1.	Annual Audited and Financial Statements	Permanent
2.	Books of Accounts, Ledgers & Vouchers	8 Financial Years
3.	Investment Records	8 Financial Years from the date of redemption
4.	Engagement letters from Auditors	8 Financial Years

Tax Records		
Sr No	Record Type	Preservation Period
1.	GST Returns, Income Tax returns, Correspondences, Returns related to Sales Tax, VAT and Service Tax Return	8 Financial Years