



MUTHOOT CAPITAL SERVICES LIMITED

(MCSL)

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POLICY ON PRESERVATION OF DOCUMENTS

This Policy was approved by the Board of Directors at the meeting held on January 15, 2016 and reviewed by the Board on April 18, 2017, June 14, 2018, October 18, 2018, February 9, 2023 and May 19, 2023.

Version Control:

Sl. No.	Name of Policy	Version	Board approval date	Remarks
1.	Policy on Preservation of Documents	v1.0	15/01/2016	Policy document approved.
2.	Policy on Preservation of Documents	v1.1	18/04/2017	Included COO into the definition of Top Management.
3.	Policy on Preservation of Documents	v1.2	14/06/2018	Incorporated the provisions regarding preservation of documents as required under the Prevention of Money Laundering Act (PMLA), 2002.
4.	Policy on Preservation of Documents	v1.3	18/10/2018	Modified the Clause 8: Modes of preservation.
5.	Policy on Preservation of Documents	v1.4	09/02/2023	Classification done on the document
6.	Policy on Preservation of Documents	v1.5	19/05/2023	No changes were made as part of the annual review.

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POLICY ON PRESERVATION OF DOCUMENTS

1. Legal Framework

The Policy on Preservation of Documents is in line with the provisions of Regulation 9 of Chapter III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Section 12 of the Prevention of Money Laundering Act, 2002 read with Rules 3, 4, 5 and 6 of the Rules notified by Notification No. 9/2005, dated 1st July, 2005 as amended by Notification No. 15/2005, dated 13th December, 2005.

2. Purpose & Scope

This Policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created during the course of business. The Policy contains guidelines to categorize documents that need to be maintained, how long these documents be retained and how and when those documents should be disposed of, if no longer needed.

3. Definitions

“Act” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

“Applicable Law” means any law, rules, circulars, guidelines or standards issued by Statutory and Regulatory Authorities under which the preservation of the Documents has been prescribed.

“Authorised Person” means any person duly assigned with the responsibility under Clause 7 of this policy.

“Board of Directors or Board” means the Board of Directors of MCSL as constituted from time to time.

“Company” means Muthoot Capital Services Limited (MCSL) incorporated under the Companies Act, 1956.

“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.

“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.

“Electronic Record(s)” means the electronic record as defined under Clause (t) of Sub Section (1) of Section 2 of the Information Technology Act, 2000.

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

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

“PMLA Act” means the Prevention of Money Laundering Act, 2002 and any amendments thereto.

“Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“Top Management” includes Managing Director, Chief Operating Officer, Chief Finance Officer, Company Secretary and Head of the Departments.

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

4. Principle Responsibility of Employees for Preservation of Documents

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

5. Safety and Integrity of Records & Documents

The Company should design appropriate safety procedures to safeguard the documents and records and to enable a return to normal operating with minimal disruption. The Company should make appropriate provisions for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability. The Company should ensure that the digital collections and technical infrastructure required to manage and access them can be restored in the event of an emergency.

6. Classification of Documents to be preserved/retained

A. As per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows:

- i) Documents whose preservation is permanent in nature; and
- ii) Documents with preservation period of not less than 8 years after completion of the relevant transactions.

Based on the above, the Company has classified the documents for preservation during the course of its business, as given below:

- a. Documents whose preservation is permanent in nature. An indicative list is enclosed herewith as **Annexure A**.
- b. Documents with preservation period of not less than 8 years after completion of the relevant transactions. An indicative list is enclosed herewith as **Annexure B**.
- c. Documents with preservation period of minimum 5 years after completion of the relevant transactions. An indicative list is enclosed herewith as **Annexure C** and
- d. Preservation of documents under other statutes as **Annexure D**.

B. As per Prevention of Money Laundering Act, 2002

In terms of section 12 of the Prevention of Money Laundering Act, 2002, the Company shall maintain a record of all transactions, the nature and value of which may be prescribed, whether such transactions comprise of a single transaction or a series of transactions integrally connected to each other, and where such series of transactions take place within a month.

As per Rule 3 of the Rules notified by Notification No. 9/2005, the Company shall maintain a record of:

- a) all cash transactions of the value of more than ₹ 10 lakhs or its equivalent in foreign currency;
- b) all series of cash transactions integrally connected to each other which have been valued below ₹ 10 lakh or its equivalent in foreign currency where such series of transactions have taken place within a month and the monthly aggregate exceeds an amount of ₹ 10 lakhs or its equivalent in foreign currency;
- c) all transactions involving receipts by non-profit organisations of value more than ₹ 10 lakhs, or its equivalent in foreign currency;
- d) all cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security has taken place;
- e) all suspicious transactions whether or not made in cash.
- f) all cross border wire transfers of the value of more than ₹ 5 lakhs or its equivalent in foreign currency where either the origin or destination of fund is in India; and
- g) all purchase and sale by any person of immovable property valued at ₹ 50 lakhs or more that is registered by the reporting entity, as the case may be.

The above referred records shall contain all necessary information specified by the Regulator to permit reconstruction of individual transaction including the following information:-

- a) the nature of the transactions;

- b) the amount of the transaction and the currency in which it was denominated;
- c) the date on which the transaction was conducted; and
- d) the parties to the transaction.

The Company shall take appropriate steps to evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities.

Further, the Company shall maintain for at least ten years from the date of cessation of transaction between the company and the client, all necessary records of transactions, both domestic or international, which shall permit reconstruction of individual transactions (including the amounts and types of currency involved if any) so as to provide, if necessary, evidence for prosecution of persons involved in criminal activity.

The Company shall ensure that records pertaining to the identification of the customer and his address (e.g. copies of documents like passports, identity cards, driving licenses, PAN, utility bills etc.) obtained while opening the account and during the course of business relationship, are properly preserved for at least ten years after the business relationship is ended. The identification records and transaction data shall be made available to the competent authorities upon request.

7. Custody of the Documents

The Managing Director and Chief Operating Officer are severally authorised to assign such persons as they may deem fit, as the authorised person.

Subject to the Applicable Laws, the custody of the documents shall be with the Authorised Person. Where the Authorised Person 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 Compact Disc, other storage devices or such other Documents and devices in his possession under this Policy to such persons as may be decided by the Managing Director or Chief Operating Officer.

8. Modes of preservation

- a) The Documents may be preserved in
 - i) Physical form, or
 - ii) Electronic Form

- b) The Authorised person is expected to observe the compliance of statutory requirements as per applicable laws.

- c) 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.
- d) The preservation of documents should be either at the premises occupied by the Company or with a third party service provider/ professional document keeping entity.
- e) The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person, so as to ensure integrity of the Documents and prohibit unauthorized access.
- f) The preserved documents should be verified at regular intervals, whether the same is stored in Company's premises or third party service provider/ professional document keeping entity. The condition of the documents stored and the quantum of the documents stored shall be verified and reconciled by the Authorised Person at a regular interval of not more than 3 months.

9. Suspension of Record Disposal in the event of Litigation or Claims

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top Management in such case shall inform all the employee by mail under "User list" of the need to retain the documents and suspension of disposal of the same.

10. Destruction of Documents

- a) 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.
- b) The temporary Documents, shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval from the Managing Director/Chief Operating Officer or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved.

11. Conversion of the form in which the Documents are preserved

- a) 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.

b) This will be undertaken by the executives and staff, after obtaining prior approval from the Authorised Person.

12. Periodical Review of the Policy by the Top Management

The policy should be reviewed periodically by the Top Management and amendments effected shall be subject to the approval of the Board. The Top Management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

13. Amendment

The Board authorize the Managing Director and Chief Operating Officer, severally to amend the indicative lists annexed to this policy as they may deem fit or from time to time. The Board has the power to amend the entire policy and the decision of the Board in this respect shall be final and binding.

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ANNEXURE - A

AN INDICATIVE LIST OF DOCUMENTS WHICH WILL BE PRESERVED PERMANENTLY

SECRETARIAL & LEGAL DEPARTMENT -

(Authorised Person - Company Secretary and Head of Legal Dept.)

- a. Certificates and Licenses granted by the Statutory Authorities
- b. Memorandum of Association & Articles of Association
- c. Minutes Books of Annual General Meeting, Board and its Sub Committees
- d. Common Seal
- e. Annual Reports
- f. Statutory Registers
- g. Register of Public Deposits
- h. Contracts entered into by the Company
- i. Property Records

FINANCE & ACCOUNTS DEPARTMENT - (Authorised Person - Chief Finance Officer)

- a. Annual Audit Reports and Financial Statements, Tax and Vat Audit
- b. Fixed Asset Register
- c. Tax Litigation documents
- d. Records on CSR Projects (including amount budgeted, spent and balance if any) projects undertaken and progress thereon.
- e. Insurance Records
- f. Tax records

ANNEXURE - B

**AN INDICATIVE LIST OF DOCUMENTS FOR WHICH WILL BE PRESERVED FOR A PERIOD NOT
LESS THAN 8 YEARS**

(After completion of the relevant transactions)

SECRETARIAL & LEGAL DEPARTMENT -

(Authorised Person - Company Secretary and Head of Legal Dept.)

- a. Register of debenture-holders
- b. Copies of Annual Return
- c. Instrument creating a charge or modification thereon
- d. Notice of Interest of Directors (MBP-1)
- e. Register of Buyback of Securities
- f. Register of Payment of Dividend
- g. Register of Directors Attendance
- h. Register of Postal Ballot & Proxies
- i. Register of Sweat Equity Shares & ESOP
- j. Register in respect of SEBI (Prohibition of Insider Trading) Regulations, 1992

FINANCE & ACCOUNTS DEPARTMENT - (Authorised Person - Chief Finance Officer)

- a. Accounts Payable/Receivable ledgers and schedules
- b. Investment Records
- c. Copies of Security Deposit receipts
- d. Employee Expense Reports
- e. Fixed Asset Purchase Orders and Bills for Fixed Assets addition
- f. Bank Guarantees
- g. Group Insurance Plans - Active Employees
- h. Insurance Policies for the Company
- i. Tax Challans, Receipts, Statements and other records

ANNEXURE - C

**AN INDICATIVE LIST OF DOCUMENTS FOR WHICH WILL BE PRESERVED FOR A PERIOD NOT
LESS THAN 5 YEARS**

(After completion of the relevant transactions)

FINANCE & ACCOUNTS DEPARTMENT - (Authorised Person - Chief Finance Officer)

- a. Sales Tax Records
- b. Service Tax Records

HUMAN RESOURCE (HR) DEPARTMENT - (Authorised Person - Head of the HR Dept.)

- a. Retirement and Pension Records
- b. Commission/Bonuses/Incentives/Awards
- c. Personnel files of employees
- d. Employee Medical Records
- e. Attendance Records
- f. Payroll Deductions
- g. Payroll Registers (Gross and Net)

- h. Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, and enquiry related papers
- i. Labour Distribution Cost Records including details regarding gratuity and retirement disbursements

ANNEXURE - D

OTHERS

As per applicable laws