



Arman Financial Services Limited

POLICY FOR PRESERVATION OF DOCUMENTS (Including Archival Policy)

1. Preface

The Board of Directors (**the “Board”**) of Arman Financial Services Limited (**the “Company”**) has approved the following Policy (**the “Policy”**) of the Company for preservation of Documents / Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as the **“Documents”**).

This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**the “Listing Regulations”**).

2. Interpretation

This policy is to be interpreted in terms of the provisions contained in the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

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.

3. Purpose of the Policy

The purpose of this Policy is:

- a) to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and
- b) to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same.
- c) for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

4. Administration

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



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- 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 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 8 years from the date on which the Document was originated. The documents preservation schedule is attached as **Appendix-A**. The Compliance Officer of the Company (**the “Administrator”**) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed.

5. Procedure for disposal of Documents

The Documents of the Company which are no longer required as per the time schedule prescribed in Appendix-A may be destroyed. The Administrator may direct Employees in-charge, from time to time, to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix-A. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at **Appendix-B**.

6. Suspension of Documents disposal in the event of Litigation or Claims

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice / Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

7. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit or from time to time and the decision of the Board in this respect shall be final and binding.

8. Policy Review

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to necessary approval of the Board of Directors.



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9. Board's Approval

This policy was approved by the Board of Directors on February 08, 2016 and reviewed by Board of Directors on February 11, 2020.



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APPENDIX-A

DOCUMENTS PRESERVATION SCHEDULE

a) Documents to be retained permanently

I. CORPORATE RECORDS

- i. Statutory Registers
- ii. Register of Members
- iii. Index of Members
- iv. Licenses and Permissions
- v. Statutory Forms except for routine compliance
- vi. Scrutinizers Reports
- vii. Common Seal Register
- viii. Minutes Books of Board, Committees and General Meetings

II. ACCOUNTS AND FINANCE

Annual Audit Reports and Financial Statements

III. LEGAL FILES AND PAPERS

Court Orders

IV. PROPERTY RECORDS

- i. Original Purchase and Sale Agreements / Deeds
- ii. Property Card, Ownership records issued by Government Authority

V. INSURANCE

Master Policies and related documents



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VI. ELECTRONIC RECORDS

All E-mails from internal and external sources that are important and have significant impact and lasting consequences.

b) Documents to be retained for a minimum period of 8 years

I. CORPORATE RECORDS

- i.** Annual Returns
- ii.** Attendance Registers–Board, Committees and General Meetings
- iii.** Office copies of Notice of General Meetings and related papers
- iv.** Office copies of Notice, Agenda, Notes on Agenda and other related papers of Board Meetings / Committee Meetings
- v.** Non routine correspondence having lasting consequences

II. ACCOUNTS AND FINANCE

- i.** Books of Accounts, Ledgers and Vouchers
- ii.** Bank Statements
- iii.** Investment Records

III. TAX RECORDS

- i.** Tax Exemption and Related documents
- ii.** Payment challans
- iii.** Excise Records
- iv.** Tax Deducted at Source Records
- v.** Income Tax Records
- vi.** Service Tax Records



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Note: 8 years to be counted from the end of completion of assessment under applicable laws, wherever applicable.

IV. LEGAL FILES AND PAPERS

Contract, agreement and related correspondence

Note: 8 years to be counted from the end of Contract / agreement period.

V. EMPLOYEES RECORDS

- i. Payroll Registers
- ii. Bonus, Gratuity and other Statutory Records
- iii. Time office Records and Leave Cards
- iv. Unclaimed Wages Records

c) Documents to be retained for a minimum period of 5 years

WEB PAGE FILES

To be retained for a period of 5 years as specified in the Listing Regulations.

To be archived for a period of 3 years after the initial period of five years of live page.

d) Documents to be retained for a minimum period of 3 years

- i. Annual Plans and Budgets
- ii. Project Documents and Related correspondence
- iii. Legal Memoranda and Opinions
- iv. Litigation files. Period to be counted from close of litigation.
- v. Employees Information Records (after separation)

e) Documents to be retained for a minimum period of 2 years

- i. General Correspondence



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- ii. Routine letters
- iii. Insurance Policies for moveable / immoveable assets, vehicles
- iv. Inspection / Survey Reports
- v. Claim Records
- vi. All E-mails from internal and external sources that are not important and have no significant impact

f) INSTRUCTIONS TO STAFF

- i. Staff will not store or transfer the Company related emails on non work related computers except as necessary or appropriate with due approvals from the respective Managers.
- ii. Staff will take care not to send confidential / proprietary information to outside sources.
- iii. Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employee's workplace.
- iv. All word / excel / Power point files may be deleted once every year depending on the importance or lack of it.



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APPENDIX – B

Sr. No.	Particulars of documents destroyed	Date and mode of destruction with the initials of Company Secretary or other authorized person
