



ABANS FINANCIAL SERVICES LIMITED
(Formerly known as Abans Holdings Limited)

POLICY ON PRESERVATION OF DOCUMENTS

(Adopted on July 12, 2021)

Abans Financial Services Limited

(Formerly known as Abans Holdings Limited)

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POLICY FOR PRESERVATION OF DOCUMENTS (V-1)

I. PREAMBLE

This Policy for Preservation of Documents (“Policy”) is in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), on preservation of the Documents to aid the employees and officers in handling the Documents efficiently. This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal and keeping a record of the same.

The Policy has been authorized by the resolution of the Board of Directors passed on 12th July, 2021 the Board only will have authority to make alterations therein.

II. OBJECTIVE

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Listing Regulations and as per Policy framed in compliance thereof to ensure that the records no longer needed or which are of no value or are redundant are discarded after following due process for the same.

The major objectives of the policy are:

- a. To identify statutory records to be maintained and preserved.
- b. To identify records to be maintained either for a period of eight years / other applicable period or permanently.
- c. To decide the mode of preserving the documents, whether in physical form or in electronic form.
- d. To decide the procedure to destroy the documents after eight years or other applicable period.
- e. To help employees understand their obligations in retaining and preserving the documents and records.

III. DEFINITIONS

“Board” means Board of Directors of the Company.

“Company” means “Abans Financial Services Limited” (Formerly known as Abans Holdings Ltd.)

“Current” means running matter or whatever is at present in course of passage.

“Document” as per Section 2(36) of the Companies Act 2013 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;

“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.

“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.

“Maintenance” means keeping documents, either physically or in electronic form.

“Policy” or “This Policy” means “Policy on Preservation of Documents”.

“Preservation” means to keep in good order and to prevent from being damaged or destroyed the Documents which may be preserved in (i) Physical Form or (ii) Electronic Form. The person responsible for compliance of applicable laws and in his absence the person so authorized by the Board for the purpose shall be responsible for preservation. He shall have custody of the documents which shall be kept under lock and key. Upon the said person ceasing to be responsible for preservation and custody, he shall hand over the documents to the next person authorized by the Board of Directors. The documents and records so preserved should be easily accessible and retrievable with appropriate back up measures in case of preservation in Electronic Form.

“Register” means documents and records required to be maintained under:

- a. The Companies Act 2013 and Rules made there under
- b. SEBI Regulations
- c. Secretarial Standards
- d. Any other applicable law for the time being in force.

“Records” means documentary evidence of past events or transactions.

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

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

IV. INTERPRETATION

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and/or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

V. CLASSIFICATION

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

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for that period which is prescribed by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is covered under the definition of current documents.

VI. PRESERVATION OF DOCUMENTS

1. Documents whose preservation shall be permanent in nature:

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently.

Details of documents whose preservation shall be permanent in nature is listed in Annexure –A.

2. Documents with preservation period of not less than eight years / other period after completion of the relevant transactions :

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years / other period after completion of the relevant transactions shall be preserved accordingly. Details of documents with preservation period of not less than eight years after completion of the relevant transactions is listed in Annexure – B.

3. Documents with preservation period other than those mentioned in (2) above :

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in 1 & 2 above shall be preserved accordingly.

VII. DESTRUCTION OF DOCUMENTS

The period stated above is minimum retention/preservation period. Prior to actual destruction/disposal in terms of this policy, the retention schedule may be reviewed by the Authorised Person if required due to an on-going business use, internal audit requirement, income tax assessments including appeals, inquiry / investigation under applicable laws or any other like reason. The documents and records shall be destroyed only after ascertaining that they are not required and have become redundant.

The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period by the Authorised Person in whose custody the Documents are stored after the prior approval of the Finance Committee of the Company.

A register of the Documents disposed/destroyed in prescribed format (Register of disposal of records) shall also be maintained stating therein 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 Authorised Person.

VIII. MISCELLANEOUS

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.

IX. AMENDMENTS

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision/amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Documents/Record whose preservation shall be permanent in nature

Sr. No.	Documents/Records
1.	Certificate of Incorporation
2.	Memorandum and Articles of Association, including all alterations therein in chronological order
3.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
4.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
5.	Register and Index of Members, debenture-holders, if any or other security holders, if any
6.	Register of renewed and duplicate share certificate, if any
7.	Register of Contracts or Arrangements in Which Directors are Interested as per Companies Act, 2013
8.	Register of Charges as per Companies Act, 2013
9.	Register of Loan and Investment by Company as per Companies Act, 2013
10.	Register under of Investment held in any other person as per Companies Act, 2013
11.	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger/Register
12.	Licenses, approvals, permissions, deed of indentures, mutation certificates, IPR's certificates and their renewals from time to time or any other document which the Managing Director thinks expedient to preserve.
13.	Policies of the Company framed under various regulations
14.	Register of disposal of records
15.	Such other records as may be required under any law from time to time

Documents / Record to be preserved for a minimum period of Eight Years

Sr. No.	Documents/Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Annual Returns as per Companies Act, 2013
3.	Register of Deposits as per Companies Act, 2013
4.	Register of Application and Allotment as per Companies Act, 2013
5.	Attendance Register of Board/Committee Meetings of the Company
6.	Office copies of Notices, Agenda, Notes on Agenda and other related paper of Meetings of the Company
7.	Annual financial statements including Annual accounts, Directors report and Auditors report
8.	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013
9.	Income Tax Returns filed under Income Tax Act, 1961
10.	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
11.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
12.	Copy of newspaper advertisement or publications
13.	Compliance Reports received from any statutory authority
14.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
13.	Disclosure/Return filled under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015
14.	Such other records as may be required under any law from time to time

REGISTER OF DISPOSAL OF RECORDS

Sr. No.	Particulars of document along with provision of law	Date and mode of destruction	Initials / signature of Authorized Person