
**POLICY ON PRESERVATION AND
ARCHIVAL OF DOCUMENTS**

(HELPAGE FINLEASE LIMITED)

CIN: L51909DL1982PLC014434

1. Introduction:

This policy is primarily framed based on Regulation 9 of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulation, 2015 (Hereinafter referred to as “Listing Regulation”) and Companies Act, 2013. Archival Policy as referred to in Regulation 30 (8) of Listing Regulations forms parts of this policy. This policy is intended to ensure compliances particularly with the Listing Regulation and other applicable provisions of Companies Act, 2013.

2. Definitions:

In this Policy, unless the context otherwise requires: -

“**Act**” means the Companies Act, 2013 and rules made there under, as amended from time to time.

“**Listing Regulation**” shall mean Securities and Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulation, 2015, as may be amended from time to time.

“**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.

“**Key Managerial Personnel**” or “**KMP**” shall have the same meaning ascribed to it under the Act.

“**Board**” or “**Board of Directors**” shall mean the Board of Directors of Helpage Finance Limited, as may be re-constituted from time to time.

“**Electronic Form**” with reference to information means any information generated, sent, received, or stored in media, magnetic, optical, computer memory, micro-films, computer generated micro fiche or similar device.

“**Regulation**” means Securities Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulation, 2015.

Words or expressions as used in this policy but not defined shall have the meanings as given in the SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015.

Any subsequent modification and /or amendments brought about by SEBI in the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 shall automatically apply to this Policy.

3. Purpose of Policy:

To formulate the policy for the preservation and achieving of documents in line with the applicable laws and the same shall be as per periodicity stated in the annexure hereto. This document also covers the archival policy of the Company.

4. Classification of Documents:

For the purpose of this policy, the documents of the Company are Classified as follows:

1. Category A

Documents which need to be preserved permanently by the Company (Annexure A) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company.

2. Category B

Documents with a preservation period of not less than Eight Years or the time period (Annexure B) stipulated by the applicable laws and statutes applicable to the Company from time to time after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions, or deletion in the documents shall also be preserved for the said period.

5. Modes of Preservation:

- The documents may be preserved either in Physical form or electronic form. However, where it is mandated to preserve in electronic form by law or regulations, such documents will be held on electronic form mandatorily.
- The officer(s) of the Company who is/are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the documents (authorized person) as determined by the Head of Department in consultation with the Managing Director.
- The preservation of documents should be in such a manner 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 the authorized person for preservation, so as to ensure integrity and confidentiality of the documents and prohibit unauthorised access.
- The Company shall make appropriate provisions for back up of all documents preserved both physically and electronically.

6. Destruction of Documents:

- As after the expiry of the retention period, the preserved documents may be destroyed in such mode as may be recommended by the authorized person and approved by the Functional Head and Compliance Head of the Company. The details of documents destroyed by the Company shall be recorded in the Register of Disposal of Records to be kept by authorized person who is disposing of the documents in the format prescribed in the policy. This applies to both physical and electronic documents.

- The Company shall maintain a register of disposal of records in the custody of the compliance officer of the Company, wherein the brief particulars of the records disposed of shall be entered.
- The register of disposal of records shall contain the following column:
 - i. Item Number;
 - ii. Brief Particulars of the records disposed of;
 - iii. Date of approval for disposal of records;
 - iv. Date of disposal; and
 - v. Mode of destruction.

The register for disposal of records shall be maintained permanently by the Company with the assistance of the Compliance officer either in physical or electronic form.

7. Conversion of form in which 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.

8. Disclaimer:

In any circumstances, where the terms of this policy differ from existing or newly enacted laws, rules, regulations or standards governing the Company, the law, rule, regulation or standard will take precedence over this policy and procedure until such time as this policy is changed to conform to the law, rule, regulation or standard.

Annexure A

Documents whose preservation will be permanent in nature:

S.No.	Nature of Documents
1.	Certificate of Incorporation
2.	Memorandum of Association and Articles of Association
3.	Register of Members
4.	Minutes of General Meeting
5.	Minutes of Board Meeting
6.	Minutes of Various Committee Meetings
7.	Register of disposal of Records
8.	Policies of the Company framed under various legislations
9.	Agreements made by the Company with Stock Exchange, Depositories, etc.
10.	Authorization license obtained from any statutory authorities
11.	Such other documents as may be required under any law from time to time.

Annexure B

Documents with preservation period not less than Eight Years or for period not less than as stipulated in the applicable law.

S.No.	Nature of Documents
1.	Books of Accounts
2.	Annual Return (s)
3.	Statutory Registers
4.	Tax related Documents and records
5.	Copy of Newspaper Publication /Advertisement
6.	Disclosures/files filled under SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015
7.	Office Copies of Notice, Agenda, Notes on Agenda and other related persons
8.	Compliance Report received from any statutory authority
9.	Such other records as may be required under any law from time to time or as may be considered appropriate by the Board of Directors of the Company.