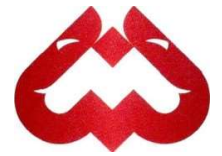




# **MANGAL CREDIT AND FINCORP LIMITED**

## **PRESERVATION OF RECORDS AND ARCHIVAL POLICY**



## Background

The preservation of records and archival policy (hereinafter referred to as 'the Policy') aims to preserve documents/ records maintained by the Company either in physical mode or electronic mode (hereinafter referred to as 'the Documents'). These records enable the Company to hold itself accountable to its policies as well as towards regulators, clients, stakeholders and the Board of Directors and can be considered as a basic tool of administration. These records also support management oversight in the conduct of audits, reviews and reports. The Policy is prepared to lay down guidelines on data retention, data archival and data destruction (hereinafter, collectively referred to as 'data management') which shall be applicable to all departments functioning within the Company.

The Policy has been formulated in pursuance of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and subsequent amendments thereto (hereinafter referred to as 'the LODR'), Prevention of Money-laundering (Maintenance of Records) Rules, 2005 and subsequent amendments thereto and the Companies Act, 2013 and subsequent amendments thereto and Notifications issued by Reserve Bank of India time to time for preservation of documents.

## Objective of the Policy

The objective of the Policy is to ensure that all important documents, generated or received by the Company, are adequately maintained and preserved in compliance with the applicable statutory provisions and to facilitate destruction of documents that are no longer required, at an appropriate time in a specified manner. The Policy establishes the guidelines for management, retention, preservation and destruction of documents, both in physical form and electronic form by the Company.

## Preservation of Documents

- A. Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and applicable amendments thereto.
- i. The 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 (*As per Annexure 1*)
  - ii. Documents with preservation period of not less than eight years 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, and Notifications etc. for a period of not less than eight years after completion of the relevant transactions shall be preserved accordingly (*As per Annexure 2*)
- B. Preservation of Documents with specific reference to the provisions of Prevention of Money-laundering (Maintenance of Records) Rules, 2005 and subsequent amendments thereto
- i. The records referred to in Rule 3 of PMLA, as applicable to the Company including its subsidiaries, shall be maintained for a period of ten years from the date of the closure of the account between the client and the Company. (*As per Annexure 3*)



- ii. Rejected loan applicant's KYC documents and other particulars furnished by the client shall be preserved for a period for ten years from the date of rejection. Audit trail of transactions of all accounts/documents, ledgers and records of transactions on the basis of which CTR, STR or CRR etc. have been filed with FIU will be preserved for fifteen years after the filing of report or till the disposal of court cases, if any, filed based on the report.

C. Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations

- i. The Company is to maintain a functional website containing
  - The basic information about the Company,
  - all Information and/or documents as specified in the applicable provisions of Companies Act, 2013,
  - All Information and/or documents as specified in Regulation 46 (2) of the Listing Regulations, all Information and/or documents mentioned in this policy, which are required to be made available on the website of the Company.
  - All Information and/or documents as mentioned in Regulation 30 of the Listing Regulations on Material Events,
  - All Information and/or documents provided to/ filed with stock exchanges.
- ii. The Company shall ensure that contents of the website are correct.
- iii. Information and/or Documents, required to be made available on the website under Regulation 46(2) of the Listing Regulations, shall be made available on the website within two working days from the date of dissemination of information and/or documents by the Company, unless specified otherwise (Clause 46(3) of Listing Regulations). The Company shall update any change in the content of its website within two working days from the date of such change in content.
- iv. Information and/ or Documents that need to be made available under Regulation 30 of the Listing Regulations shall be made available on the website simultaneously with disclosure to Stock Exchanges.
- v. The information and/or documents uploaded on the website shall be available for current financial year and for the preceding five financial years.
- vi. Information and/ or Documents shall be arranged under proper heads and sub heads in such manner that they can easily be located/ searched by the viewers, viz.
  - The information and/or documents may be arranged financial year wise with further segregation into four quarters of the financial year.
  - All policies etc. or the information/ documents of a general nature can be clubbed together at one place.

**Effective Date**

The Policy, as approved by the Board of Directors, shall be effective on 14<sup>th</sup> February, 2023. Further please note that any amendment required as per SEBI, RBI, Companies Act, 2013 and rules and regulations stated there under from time to time, will be incorporated subject to approval of Board of Directors.



### Annexure 1

Documents whose preservation shall be permanent in nature

Sr. no	Nature of Documents
1	Memorandum and articles of association of the Company
2	Registration Certificates
3	Licenses & Statutory Approvals
4	Statutory Registers required under applicable laws
5	Audited financial statements
6	Minutes of General Meeting
7	Minutes of Board Meeting
8	Minutes of various Committee Meetings
9	Material agreements/ contracts
10	Orders issued by Courts/ Statutory bodies
11	Investment documents/ proofs including certificates, etc.

### Annexure 2

Documents with preservation period of not less than eight years after completion of the relevant transactions

Sr. no	Nature of Documents
1	Books of accounts
2	Annual return(s)
3	Personnel documents
4	Insurance policies/ claims under various policies
5	Correspondences with the Regulators
6	Non-statutory registers/ documents
7	All notices pertaining to disclosure of interest of directors
8	Correspondence with Department/Shareholders
9	Certificates surrendered to a Company
10	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

### Annexure 3

Documents with preservation period of not less than ten years after the date of closure of the relevant Account/transactions

Sr. no	Nature of Documents
1	Clients KYC documents
2	Records of transaction & ledger book