

## Policy on Preservation of Documents

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Hiranandani Financial Services Private Limited

### Policy Control

Version	Particulars	Recommended by	Approved by	Approval Date	Owner
1.0	Date of adoption	ACB Committee	Board of Directors	October 28, 2024	Secretarial
2.0	Date of review	ACB Committee	Board of Directors	May 10, 2025	Secretarial
3.0	Date of review	ACB Committee	Board of Directors	May 06, 2026	Secretarial

## INTRODUCTION

Hiranandani Financial Services Private Limited (“HFS” or “the Company”), is registered with the Reserve Bank of India (“RBI”) as an Investment and Credit Company- Non-Deposit Taking Non-Banking Finance Company (“NBFC”). The Company is classified as a Middle Layer NBFC under the Reserve Bank of India (Non-Banking Financial Companies – Registration, Exemptions and Framework for Scale Based Regulation) Directions, 2025. HFS is primarily engaged in the business of granting loans. HFS has also listed its debt securities on BSE Limited.

## OBJECTIVE

The objective of formulating this Policy is to:

- a. organize documents and records that will enable search and retrieval;
- b. define the period of retention of various kinds of documents;
- c. dispose of documents and records that are no longer needed;
- d. meet the regulatory and legal requirements.

It defines the organisation’s responsibility on preservation of documents and to provide guidance to the employees in making decisions on Document Management. This Policy will outline systematic identification, categorisation, maintenance, retention, retrieval, archival and Disposal of documents received or created during the Company operations.

“Preservation” is the means by which document / records are protected for the present or future use. The objective of preservation is to minimize the risk of loss of records and slowing down, as much as possible, the process of physical deterioration which affect most archive materials.

## MODE OF PRESERVATION

The documents specified in the Annexures to this Policy shall be retained or preserved in one or more of the following formats:

- a. Physical Form (Hard Copy)
- b. Electronic/Digital or Digitized Forms/Scanned Copy (Soft Copy)
- c. Both Physical and Electronic/Digital or Digitized Forms

## APPLICABLE LAWS AND REGULATIONS

The Company is required to comply with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements, 2015 (“SEBI Listing Regulations”).

The Company is required to maintain certain types of corporate records for a specified period of time under applicable corporate/securities laws, including but not limited to the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 and the Companies Act, 2013.

## DEFINITIONS

- a) **“Applicable laws”** means Companies Act, 2013, SEBI Listing Regulations, Reserve Bank of India (RBI) Directions for NBFCs and any other act, laws, rules as may be applicable and statutes applicable to the Company, mandating preservation of documents.
- b) **“Authorised Person”** means any person duly authorized by the Board.
- c) **“Board of Directors or Board”** means the Board of Directors including any committee as constituted by the Board of Hiranandani Financial Services Private Limited, as constituted from time to time.
- d) **“Company”** means Hiranandani Financial Services Private Limited.
- e) **“Document/s”** includes all papers, summons, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

- f) **“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.
- g) **“Listing Regulations”** shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any statutory modification thereof.
- h) **“Policy”** means this policy on Preservation of documents.
- i) **“Stock Exchanges”** shall mean to include National Stock Exchange of India and/or BSE Limited.
- j) **“Schedules”** means the schedules I and II appended to this policy.

**All other words and expressions used but not defined in this Policy, but defined in the SEBI Act, 1992, the Companies Act, 2013, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and / or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.**

#### **PRESERVATION AND ARCHIVAL OF DOCUMENTS**

As per the Policy, the Company shall maintain and preserve register and records, books and/or paper, books of accounts and other documents etc. as follows:

- a) Schedule I – to be preserved Permanently;
- b) Schedule II – to be preserved for not less than Eight years and/or as prescribed under the Law;

In the case of pending matters/litigation/disputes, the documents shall be preserved till the resolution of pending matter/litigation/dispute.

In order to preserve relevant documents effectively, the documents/records shall be either maintained by the Company at its own locations or it may be stored with a Document Storage Company with due care and enough space.

#### **RECORD STORAGE**

All the records must be stored either in physical form or electronic form.

#### **DESTRUCTION OF DOCUMENTS**

The documents specified in Schedule II to this Policy, kept by the Company, may be destroyed after the expiration of the period specified in the Schedule in such mode under the instructions approved by the Board of Directors or of the department as per the applicable law.

#### **ARCHIVAL PROCEDURE**

All disclosures / filings made to stock exchanges pursuant to the applicable regulations shall be hosted on the website for a minimum period of five years and thereafter the documents shall be archived and stored under the archival folder for a further period of one year or such other period as may be prescribed under the applicable laws as decided by the Board of Directors, CEO and/or the CFO from time to time. Documents shall be moved / transferred to archival folder under the respective heads / sub-folders in a way so that these documents can be searched easily as and when required by any person. All information required to be uploaded on the Company’s website in pursuance of any other statute /legislation / regulation, shall be hosted on the Company’s website for such period as may be mandated by that statute / legislation / regulation.

All information/documents hosted on the website of the Company voluntarily by the management shall be retained on the website/archive section for such period of time as may be deemed fit at the absolute discretion of the management of the Company.

#### **REVIEW OF POLICY**

Any subsequent amendment / modification in the applicable laws shall automatically apply to this Policy. In case of any conflict between the contents of this Policy and the legal provisions, this policy shall be deemed to have been modified to be in accordance with applicable law, from time to time.

This Policy shall be subject to an annual review by the Board of Directors as recommended by the Audit Committee pursuant to regulatory changes or business requirements of the Company and the revised Policy shall be approved by the Board.

**SCHEDULE I (DOCUMENTS TO BE PRESERVED PERMANENTLY)**

<b>Sr no</b>	<b>Secretarial Records preserved permanently</b>
1.	All Documents and Information as originally filed with the Registrar of Companies for Incorporation of Company.
2.	Certificate of Incorporation and any Licenses, Permissions
3.	Memorandum and Articles of Association, as amended from time to time
4.	Register of Renewed and Duplicate Share Certificate (Form SH-2)
5.	Register of Contracts or Arrangements in which Directors are interested (Form MBP-4) and copy of contracts or arrangements entered into
6.	Register of Transfer and Transmission
7.	Register of Charge
8.	Register of Members along with the Index
9.	Register of Directors and Key Managerial Personnel
10.	Register of loans, guarantee, security and acquisition made by the Company
11.	Register of Investments made by Company not held in its own name
12.	Minutes of Board Meeting and other Committee Meetings of the Board and resolutions passed by Circulation. Minutes of the General Meetings of class of shareholders / creditors or resolutions passed by way of postal ballots.
13.	Books and Papers of Amalgamated Companies. Minutes of all Meetings of the transferor company, as handed over to the transferee company.
14.	*Books and documents relating to the issue of share certificates including blank forms of share certificates

*\*Thirty years, but in case of disputed matters, permanently.*

**SCHEDULE II (DOCUMENTS TO BE PRESERVED FOR MINIMUM EIGHT YEARS AND/OR AS PRESCRIBED UNDER THE LAW)**

<b>Sr. No</b>	<b>Name of Documents and relevant section under Companies Act,2013</b>	<b>Period specified under law</b>
1.	Instrument creating Charge or Modification thereof	Eight years from the date of Satisfaction of Charge
2.	Register of Debenture Holders or other security holders	Eight years after the redemption of debentures or other security holders
4.	Annual Return and copies of all certificates and documents required to be annexed thereto	Eight years from the date of filing with the Registrar
5.	Books of Accounts together with the vouchers relevant to any entry in such books of account, Balance Sheet and Profit and Loss Statement.	Eight years from the close of relevant financial year
6.	Notice of Interest by Directors and Key Managerial Personnel	Eight years from the close of the relevant financial year
7.	Attendance Register of Meetings of the Board and Committees	At least Eight financial years
8.	Office copies of Notices, Agenda, Notes on Agenda and other related papers-	As long as they remain current or for Eight financial years, whichever is later
9.	Office copies of the General meeting Notices, scrutiniser's report, Postal Ballot and related papers.	As long as they remain current or for Eight financial years, whichever is later
10.	Attendance Register of the General Meeting	At least Eight financial years
11	Register of Proxies	At least Eight financial years
12.	Details / statement of unclaimed dividend	At least for Eight years from the relevant financial year of transfer to IEPF.
14.	Certified copy of the order of any court or Tribunal	At least for Eight Years
15.	All the relevant disclosures of information and events communicated to the stock exchanges as per Listing Regulations will be hosted on the website of the Company under the section entitled "Investor Relations" for a period of five years and thereafter the same shall be archived and moved to the location or	

	placed under - "Historic Material Events/ Information" for a period of 1 year	
16.	Disclosures under SEBI (Prohibition of Insider Trading) Regulations, 2015	At least 5 years