

DOCUMENTS PRESERVATION

POLICY

OF

KNAB FINANCE ADVISORS

PRIVATE LIMITED

(KNAB)

1. Objective

The Board of Directors (the “Board”) of **KNAB FINANCE ADVISORS PRIVATE LIMITED** (the “Company”) has adopted this Policy at its meeting held on 27th May 2024 for preservation and archival of documents/records maintained by the Company either in physical mode or electronic mode (hereinafter referred to as “Documents”).

2. This Policy shall be governed by the Companies Act 2013, Reserve Bank of India, Banking Regulation Act, 1949, Rules, Regulations, Circulars, Guidelines and Directions, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.
3. The purpose of this Policy is to ensure that the all the Documents of the Company are adequately protected and preserved as per the statutory requirements and safeguard the Documents from getting mishandled. This Policy shall cover all statutory, business and customer records of the Company, including written, printed and recorded matter and electronic forms of records. The Managing Director/Chief Executive Officer of the Company would be responsible for overseeing the implementation of the Policy. This Policy also envisages the purpose of aiding staff 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 provisions and regulatory requirements.
4. This Policy is applicable to the Company as whole, i.e., all branches, offices and departments of the Company. It shall ensure that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care. This Policy shall remain valid until such time it is modified/amended/alterd by the Board.

5. Definitions

‘Board of Directors’ or ‘Board’ shall mean the Board of Directors of ‘KNAB FINANCE ADVISORS PRIVATE LIMITED’, as constituted from time to time.

‘Company’ shall mean ‘KNAB FINANCE ADVISORS PRIVATE LIMITED’.

“Applicable Law” means any law, rules, circulars, guidelines or standards issued by the Central Government, Reserve Bank of India, Ministry of Corporate Affairs, The Institute of Company Secretaries of India or any other statutory/regulatory authorities, in which the preservation of the Documents is prescribed, and are applicable to the Company.

‘Documents’ shall mean all papers, files, vouchers, registers, ledgers, cash scrolls, manuals, agreements, paid cheques, drafts, orders, declarations, forms, books, tapes, floppies, CDs, DVDs, electronic storage devices, etc. and the like as required to be maintained under any applicable law or regulation for the time being in force or in existence, maintained in physical or electronic form or both and does not include multiple or identical copies.

“Electronic Record(s)” means the electronic record as defined under section 2(1)(t) of the Information Technology Act, 2000.

“Electronic Form” means any contemporaneous electronic devices such as computer, laptop, desktop, compact disc, space on electronic cloud or any other form of electronic storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over the access to it.

“Maintenance” means keeping Documents, either physically or in Electronic Form.

"Preservation" means to keep in good order, preventing from being altered, damaged or destroyed.

6. The Company should take appropriate steps to evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities as per the Applicable Law. Further, NBFCs should maintain for at least ten years from the date of cessation of transaction between the NBFCs and the client, all necessary records of transactions, both domestic or international, which will permit reconstruction of individual transactions (including the amounts and types of currency involved if any) so as to provide, if necessary, evidence for prosecution of persons involved in criminal activity.

Proper record of transactions prescribed under Rule 3 of Prevention of Money Laundering (Maintenance of Records) Rules, 2005 (PML Rules, 2005) shall be maintained so as to permit reconstruction of individual transaction, including the following: (i) the nature of the transactions; (ii) the amount of the transaction and the currency in which it was denominated; (iii) the date on which the transaction was conducted; and (iv) the parties to the transaction.

The Company should ensure that records pertaining to the identification of the customer and his/her address (e.g. copies of documents like passports, identity cards, driving licenses, PAN, utility bills etc.) obtained while opening the account and during the course of business relationship, are properly preserved for at least ten years after the business relationship is ended. The identification records and transaction data should be made available to the competent authorities upon request.

7. Principle of Responsibility of Employees for Preservation of Documents

All the employees in the permanent or contractual rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their area of work / assignments and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company’s employees would immensely help the Company’s litigation preparedness, helping the Legal Department and External Legal Counsels of the NBFC in tracking down the documents and to efficiently handle the legal cases.

8. Classification of Documents:

Based on the recommendations of the Management, the Board has classified the following documents to be retained and preserved for future as required under the relevant provisions of applicable Law & Rules:

Category A	The Documents of permanent nature shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time; provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.
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Category B	The Documents of the Company to be maintained and preserved for specified time period after completion of the relevant transactions shall be preserved by the Company for the term not less than ten years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the Documents shall also be preserved for a term not less than ten years. Further the Company may, if deemed fit and possible from time to time, maintain mentioned documents in electronic form, to the extent possible.
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An indicative list of Documents and the time-frame of their preservation is provided in Annexure I to this Policy.

Note:

- i. Documents which are required to be mandatorily maintained and preserved by the NBFC shall be preserved for such duration as may be specified by the relevant statute or regulation, as the case may be.
- ii. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this Policy.
- iii. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this Policy.

Notwithstanding anything contained in this Policy:

- i. In case of dispute with tax authorities or government authorities, records and documents relating to dispute shall be preserved till the settlement of dispute or ten years, whichever is later.
- ii. Records pertaining to transactions listed out in Rule 3 of The Prevention of Money-Laundering (Maintenance of Records of the Nature and Value of Transactions, The Procedure and manner of Maintaining and Time for Furnishing Information and Verification and Maintenance of Records of the Identity of the Clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005, shall be maintained for a period of ten years from the date of cessation of the transactions between the client/customer and the Company.

9. Mode of Preservation

The Documents may be preserved in Physical Form or Electronic Form. The retention period of preservation of documents shall remain the same, irrespective of maintenance of documents in physical or electronic format or both.

The officer of the Company required to preserve the Document shall be an Authorized Persons, who is generally expected to observe the compliance of the requirements of Applicable Law.

The preservation of Documents should be such as to ensure that there is no tampering, alteration and destruction. Nothing shall be done which endangers the content, authenticity, utility or accessibility of the Documents.

The Documents should be categorized based on their nature and confidentiality. The original Documents of Importance is to be kept in fire proof storage and, if required, locker facility can be availed to ensure safe-keeping of the records and to safeguard the Documents from getting mishandled.

The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Persons with preservation, so as to ensure integrity of the Documents and to prohibit the unauthorized access.

All policies, documents and other information not related to any particular period/ event shall be on display on the Company's website till they are replaced by an updated version. Thereafter they will be archived and preserved in a secured server of the Company.

10. Custody of Documents

All documents shall be under the custody of respective head of the departments as detailed below:

Sl. No.	Documents Authorised Persons	Authorised Persons
1	Tax / Accounting Records / Financial Statements	Chief Financial Officer
2	Board and Committee Minutes / Statutory Registers	Company Secretary
3	Employment / Personnel Records / Lease Documents / Contracts	Head HR
4	Customer Transaction documents & KYC documents Head-Operations	Head Operations
5	Legal Documents	Head Legal
6	Intellectual Property and IT records	Head IT

11. Destruction of Documents

- a) Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.
- b) 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 Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice.
- c) The documents specified in the Annexure to this Policy, kept by the Company, may be destroyed after the expiry of the minimum retention period specified in the Annexure and after review and approval by the Managing Director or such other person(s) as may be authorized by the Board for this purpose. However, in the case of pending matters/ litigation/ disputes, the documents shall be preserved till the resolution of pending matter/ litigation/ dispute. A register of the Documents

disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.

d) The entries in the register shall be authenticated by the Authorised Person(s).

12. Maintenance of the Records of Transaction

The Company shall maintain proper record of transactions as required under section 12 of the PMLA, 2002 read with Rule 3 of the PML Rules as mentioned below:

- All cash transactions of the value of more than Rupees Ten lacs or its equivalent in foreign currency;
- All series of cash transactions integrally connected to each other which have been valued below Rupees Ten lacs or its equivalent in foreign currency where such series of transactions have taken place within a month and the aggregate value of such transactions exceeds Rupees Ten lacs;
- All transactions involving receipts by non-profit organizations of Rupees Ten lacs or its equivalent in foreign currency;
- All cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security or a document has taken place facilitating the transactions; and all suspicious transactions whether or not made in cash and by way of as mentioned in the Rule 3(1) (D).

The internal monitoring system should have an inbuilt procedure for reporting of such cash transactions and those of suspicious nature whether made in cash or otherwise, to the Principal Officer on a fortnightly basis. However, there is no need to furnish NIL reports.

13. Location of the Records

The overriding principle guiding the choice of location of records is that they will continue to be available to Management on a timely basis. The following principles will be taken into account for selecting the record location:

- The records and data are available to management on a timely and reasonable basis
- Adequate back-up facilities will be made available for electronically stored data
- Accessibility of the record location from the point of view of RBI audit, internal and external auditors
- Secrecy and confidentiality of data to be maintained.
- Safety of Records both inhouse and third party (with economy in cost)

14. Records Appraisal

The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process is to ensure the records are examined at the appropriate time to determine whether or not they are worthy of archival preservation, whether they need to be retained for a longer period as they are still in use, or whether they should be destroyed.

The following categories of the Documents may be destroyed as per normal administrative procedure of the company.

- Brochures
- Copies of Press cutting, press statement or publicity material
- Letters of appreciation or sympathy or anonymous mail.
- Request for copies of maps, plan, charts, advertising material.
- Facsimiles where photocopy has been made.

➤ Telephone /Fax message

15. Amendments to this Policy

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being 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.

Annexure I
Retention Schedule

Documents Related to Secretarial and Board Related Matters

Record Type	Retention Period	Category
Certificate of incorporation, Memorandum/Articles of Association and any Licenses and Permissions	Permanent	A
Common Seal, if required by law	Permanent	A
Minutes of the Board Meeting, various Committees Meetings and General Meetings and Scrutinizer's report	Permanent	A
Statutory Forms and disclosures except routine compliances	Permanent	A
Statutory Registers that may be applicable for listed NBFC Company under the Companies Act, 2013, SEBI and RBI Regulations	Permanent	A
Policies Formed by the Company under various laws and regulations	Permanent	A
Court Orders relating to shareholder matters	Permanent	A
Register of Members along with the Index	Permanent	A
RBI Licenses/ Certificates/ Renewals etc.	Permanent	A
Miscellaneous licences/ Certificates obtained from Statutory Authorities including Labour Laws/ Taxation Laws, etc.	Permanent	A
Property Records--- Agreements/ Contracts / Documents relating to acquisition and sale of Real Property.	Permanent	A
Other records as may be required under any law(s), from time to time.	Permanent	A
All books and documents relating to the issue of share certificates, including the blank forms of share certificates	Permanent	A
Preservation of IEPF transfer records	Permanent	A
Annual Returns and copies of all certificates and documents required to be annexed thereto.	10 Years	B
Audited Financial Statements / Auditors Reports	10 Years	B
Books of account and supporting documents, vouchers, records. contracts, deeds, agreements, etc	10 Years	B
Attendance registers	10 Years	B
All notices under Section 184 of the Companies Act, 2013 read with Rule 9 of the Companies (Meetings of Board and its powers) Rules, 2014	10 Years	B
Agenda papers. Notice of Board Meeting, Committee Meeting, General Meeting and other related papers	10 Years	B

The instrument creating a charge or modification	10 Years	B
All books and documents relating to the issue of share certificates, including the blank forms of share certificates	10 Years	B

Register of debenture-holders including an index of the names	10 Years	B
Registers of deposits	10 Years	B
Foreign register of debenture-holder	10 Years	B
Registers of deposits	10 Years	B
The instrument creating a charge or modification	10 Years	B
Digital Database for Unpublished Price Sensitive Information	10 Years	B

Other Documents/Electronic Records

Record Type	Retention Period	Category
Images of payment instruments (CTS)	10 Years	B
Tele transfer (including electronic fund transfer) confirmations	10 Years	B
Wire transfer messages and confirmation messages	10 Years	B
Confirmations of E-mail, telegram, telephone, fax etc.	10 Years	B
Backups in floppies and CDs, Hard drives etc.	10 Years	B
EXE files-files to run the software	10 Years	B
Source codes creating EXEs	10 Years	B

Files (including those in Electronic Media)

Record Type	Retention Period	Category
Closed Loan Accounts-Personal files	10 Years	B
Correspondence with branches	10 Years	B
Concurrent Audit Reports where all comments are rectified and no comments relating to disciplinary proceedings pending	10 Years	B
RBI inspection Reports where all comments are rectified and no comments relating to disciplinary proceedings pending	10 Years	B
Detailed Internal Inspection Report file where all comments are rectified and no comments relating to disciplinary proceedings pending	10 Years	B
Personal files of customers	10 Years	B
Confidential files	10 Years	B
Files relating to claims of deceased customers	10 Years	B
General correspondence	10 Years	B
Stop payment Instruction file	10 Years	B
Loan Document files (other than those returned to borrower)	10 Years	B
Balance sheet of the Company / Subsidiaries/ Consolidated financials etc.	10 Years	B
Charge Taking Reports	10 Years	B
Files on Unclaimed Accounts	10 Years	B

Files relating to Income Tax including Income Tax returns, Tax deducted at source, etc	10 Years	B
Licenses, sanctions from RBI/Government/local bodies and the like for activities which are concluded and which are no more relevant	10 Years	B
Postal receipts and acknowledgment Receipt and acknowledgment of Swift etc	10 Years	B

Insurance Policy Execution/Renewal Certificate	10 Years	B
Insurance Claims under various Policies	10 Years	B
Contracts/ Agreements/ Purchase Orders including Renewal, Modification and Termination	10 Years	B
Loan Agreements with the Clients including Mortgages/ Title Deeds	10 Years (except Title deeds which shall be preserved until returned to client)	B
RBI Records including Statutory Returns submitted from time to time	10 Years	B
Legal Records including Correspondence with Courts/ other statutory bodies regarding any petition/ case/suit etc.	10 Years	B
Personnel Records including Official Personnel Files of Active Employees and Official Personnel Files of inactive Employees	10 Years	B

Registers

Record Type	Retention Period	Category
Attendance Register	Permanent	A
Leave Register	Permanent	A
Remittance Registers	10 Years	B
Bills Registers	10 Years	B
Clearing Registers	10 Years	B
Loan liability register	10 Years	B
DD/MT/TT advices/Register	10 Years	B
Drawing Power Register	10 Years	B
Stocks and shares Register	10 Years	B
Balancing Register	10 Years	B
Safe Custody Register	10 Years	B
Safe and Furniture Register	10 Years	B
Account Receivable/Payable register	10 Years	B
Power of Attorney Register	10 Years	B
Stop Payment Instruction Register	10 Years	B
Equitable Mortgage Register/Visit Register	10 Years	B
Letter of Credit Register	10 Years	B