



CREDITACCESS GRAMEEN LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

Revision History

Version	Author	Description of Changes	Release Date
1.	Company Secretary	First version	December 01, 2017
1.	Compliance Officer	Re adoption	March 23, 2022
2.	Chief Compliance Officer	<ul style="list-style-type: none"> • Amendments carried out to “Introduction” section to incorporate applicable regulatory provisions and few definitions inserted. • “Destruction of documents” section has been amended to make it more comprehensive. 	April 1, 2024

Version	Author	Reviewed By	Approved By
1.	Company Secretary	MD & CEO	Board of Directors
1.	Compliance Officer	MD & CEO	Board of Directors
2.	Chief Compliance Officer	Managing Director	Board of Directors

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A. INTRODUCTION

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the board of directors of a listed company is required to frame a policy for Preservation of Documents, in electronic mode, classifying such documents into 2 (two) categories:

- i. Documents to be preserved permanently; and
- ii. Documents to be preserved for a period not less than 8 (eight) years.

Pursuant to Section 120 of the Companies Act, 2013 ('Act') read with Rule 27 of the Companies (Management and Administration) Rules, 2014, the Company shall maintain record of the documents as required to be maintained under the Act or Rules made there under, in electronic form.

In addition to the above, the concerned department head(s) would maintain/preserve such documents as may be required to be maintained in accordance with other laws applicable to the Company, for such period of time as may be prescribed therein.

The Management would also preserve the documents in Physical mode, to suit the business requirements of the Company, from time to time

B. DEFINITION

- a. "**Act**" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.
- b. "**Applicable Law**" means any law, act, rules, circulars, guidelines or standards, etc. under which the preservation of the Documents has been prescribed.
- c. "**Company**" mean CreditAccess Grameen Limited.
- d. "**Documents**" mean statutory records, registers, returns, forms etc., and the like required to be maintained and preserved by the Company both, in physical and / or electronic form under the Companies Act, 2013, Securities and Exchange Board of India Act, 1992, Securities Contracts (Regulation) Act, 1956, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Depositories Act, 1996 or under any other applicable laws or regulations for the time being in force and such other records, returns. Forms as may be decided by the management from time to time.
- e. "**Electronic mode**" 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.
- f. "**Regulations**" means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.

C. OBJECTIVES

To determine preservation period for records/documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Company's own information retrieval needs (reference value);
- Statutory requirements under respective statutes;
- Litigation requirements;
- To ensure easy retrieval; and
- To ensure that unwanted records do not occupy storage space.

D. RESPONSIBILITY

The Head of the concerned Department will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

E. PRESERVATION PERIOD

The preservation period commences from the conclusion of financial year, in which the document has been formed or the last entry was made; the preservation period of agreements commences from the end of the financial year in which the terms of the agreement expire.

For determining the preservation period, the records are categorized into the following three categories:

Sl. No.	Category and Description	Period of preservation
1	Records/documents with short reference value: Documents that are to be preserved for a short period for the purposes of enquiry, evidence, verification, evaluation, etc.	Less than 8 (eight) years *
2	Records/documents required to be maintained as per statutory requirements and having higher reference value:	Documents to be preserved for a period ranging from 8 (eight) to 10 (ten) years
	(i) Documents having contractual/legal implications, that need to be preserved for prescribed periods as per statutory requirement, such as, books of accounts and tax records of the Company; and (ii) Records, that need to be, preserved for a particular period for the Company's own reference needs, such as, employee records.	

3.	Permanent Records: Statutory and other records having permanent value for the Company even after the expiry of legal preservation period such as minutes and Board of Directors related documents, statutory registers of the Company, other documents to be maintained under various statutes and regulations, etc.	Permanently **
4.	Records for evidence: Records which are required for adducing evidence in judicial or quasi-judicial or other dispute redressal Forum	Till the time of final disposal of the matters.

- **Books of accounts together with the vouchers relevant to any entry in such books of account, register of debenture holders or register for any other securities issued by the company, copies of all annual returns, disclosure of interest received from the directors of the company in the manner prescribed, Attendance registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings, Instrument creating a Charge or modifying a Charge, if any, Changes to the Memorandum of Association and Articles of Association, if any, Tax Records, Employment/Personnel Record in case of employees of the company, Press Releases, Legal documents, Loan Documents, MBDFs, Customer KYC records.*
- ***The original signed and stamped memorandum of Association and the Articles of Association of the company, Minutes of General Meetings, Board Meetings and various Committee Meetings, Register of members along with index, Foreign Register of Members, if any, Register of loans, guarantee, security and acquisitions made by company, register of contracts with related party and contracts and bodies etc., in which directors are interested, Register of Charges, Registers of Renewed and duplicated share certificate, Register of directors and KMP, Intellectual property documents shall include, but shall not be limited to Copyrights, Trademarks, Patents. Intellectual property rights documents that are owned by the company shall be retained by the company permanently*

Note: Documents required to be maintained under any other applicable law shall be preserved / maintained for such timeline as prescribed therein.

Documents of special nature:

Notwithstanding the general guidelines, care shall be taken by the respective departments of the Company to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi-judicial etc. are preserved in accordance to specific needs and beyond the prescribed period.

Documents issued by Regulatory Authorities:

Further, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government/ Statutory Bodies, care shall be taken to maintain and preserve such records in accordance with specific guidelines/instructions, if any, issued by the relevant authority.

Location for preservation of documents/ records:

Documents/ records shall be preserved and maintained with concerned department of the Company. In the event the location is other than that of the concerned department, the same shall be documented and filed for reference purposes for the respective department of the Company. Critical documents of the Company, as may be determined by the Company, that requires to be preserved on a permanent basis, shall be preserved in a fire proof or other such secure cabinets with the concerned department of the Company.

F. MODE OF PRESERVATION

Records/documents shall be preserved either in physical or electronic form.

G. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the concerned department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate /unimportant /irrelevant. This applies to documents maintained in both, Physical and Electronic mode. Destruction of documents can be undertaken periodically with the approval of concerned department head(s). A list of destroyed documents along with the date of destruction has to be maintained by concerned department(s).

H. POLICY REVIEW

This policy shall be subject to review and changes as may be deemed necessary by the Board of Directors of the Company. Any changes to the policy shall be made with the prior approval of the Board of Directors of the Company and in compliance with any regulatory and statutory requirements from time to time.

I. EFFECTIVE DATE

This policy shall be effective from December 1, 2017.

J. CONTACT DETAILS

In case of any questions or clarifications about the policy or disclosures made by the Company, please write to Company Secretary & Chief Compliance Officer at csinvestors@cagrameen.in, who shall be in charge of administering, enforcing and updating this Policy from time to time.