



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
2.	Chief Compliance Officer	Re-adoption	April 21, 2025
3	Company Secretary	<ol style="list-style-type: none"> 1. Holistic review of policy aligning with extant regulatory provisions under Companies Act & SEBI Regulations to make it comprehensive & consistent. 2. Simplified and aligned “Preservation period” section with regulatory requirement and listed out the documents to be preserved / maintained separately for better clarity. 	April 16, 2026

Version Control

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
2.	Chief Compliance Officer	Managing Director	Board of Directors
3.	Deepti Ramani, CS & CO	Gururaj Rao, COO Ganesh Narayanan, MD & CEO	Board of Directors

Contents

A.	Introduction	4
B.	Definition.....	4
C.	Objectives	5
D.	Responsibility.....	5
E.	Preservation Period	5
F.	Mode of Preservation	6
G.	Destruction of Documents	6
H.	Policy Review	6
I.	Effective Date.....	6
J.	Contact Details.....	6

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.

Further, 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 the above applicable provisions and 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:

- i. Company's own information retrieval needs (reference value);
- ii. Statutory requirements under respective statutes;
- iii. Litigation requirements;
- iv. To ensure easy retrieval; and
- v. 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:	Not Less than 8 (eight) years after completion of the relevant transactions (As per Annexure -2)
3.	Permanent Records:	Permanently (As per Annexure -1)
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, including all stages of appeal, revision, review, or rehearing, and thereafter for such additional period as may be required for enforcement of the

		order/judgment or as per applicable limitation periods under relevant laws and unsatisfied claims by or against the Company.
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Note: Documents required to be maintained under any other applicable law shall be preserved / maintained for such timeline as prescribed therein.

F. MODE OF PRESERVATION

Records/documents shall be preserved either in physical or electronic form. Critical documents of the Company including but not limited to documents mentioned under Annexure 1 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.

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 /redundant /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) permanently.

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 regulatory and statutory requirements, as applicable from time to time.

I. EFFECTIVE DATE

This policy shall be effective from December 1, 2017.

Annexure – 1

Documents that are required to be preserved Permanently

- Incorporation Documents
- Certificate of Registration / other licenses issued by RBI
- Licenses issued by / Registrations under PFRDA / IRDA / Other Statutory bodies
- Form FC – GPR, FC – TRS, ARF etc.
- The Memorandum of Association and the Articles of Association of the Company
- Minutes of General Meetings, Board Meetings and Committee Meetings
- Register of Members
- Foreign Register of Members, if any
- Register of loans, guarantee, security and acquisition made by the Company
- Register of investments not held in its own name by the Company, if any
- Register of contracts with related party and contracts and Bodies etc. in which directors are interested.
- Register of Charges
- Register of Directors and Key Managerial Personnel
- Merger Order(s) issued by Hon'ble High Court/National Company Law Tribunal
- Approval(s) and & license(s) received from Statutory Authorities, Central & State Government(s)
- Title deeds / Property documents
- Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.

Annexure – 2

Documents which are to be maintained for at least eight financial years:

- Books of account together with the vouchers relevant to any entry in such books of account.
- Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company.
- Copies of all Annual Returns.
- E-forms filed with the Registrar of Companies.
- 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 the Articles of Association, if any
- Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for appeal, as the case may be
- Employment /Personnel Record should be retained for a period of eight (8) years following cessation of employment in case of employees of the Company.
- Other RBI Returns (FLA, Form 15, Form NBS-7, ALM, et