



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"> Holistic review of policy aligning with extant regulatory provisions under Companies Act & SEBI Regulations to make it comprehensive & consistent. 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
4.	Company Secretary	Amendments to incorporate the requirements of Section 128 of the Companies Act, 2013 and Rule 3 of the Companies (Accounts) Rules, 2014 for maintenance of Books of Account in electronic mode, including digitisation of vouchers (employee reimbursements and vendor payments), archival, backup, retention and server location (new Section G and consequential changes).	October 22, 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.	CS & CO	COO MD & CEO	Board of Directors
4.	CS & CO	COO MD & CEO	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.

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.

Further, in accordance with the provisions of the Prevention of Money Laundering Act, 2002 ("PMLA") and the rules made thereunder, the Company should maintain all requisite records of transactions with customers and the KYC, AML & CFT Policy duly approved by the Board of Directors.

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 should maintain record of the documents as required to be maintained under the Act or Rules made there under, in electronic form.

Further, in terms of Section 128 of the Act read with Rule 3 of the Companies (Accounts) Rules, 2014 ("Account Rules"), as amended from time to time, The Company may maintain its books of account and other relevant books and papers in electronic mode. Accordingly, the manner of maintenance, backup, retention and storage of the Books of Account in electronic mode has been set out in Section G of this Policy.

The documents would be preserved either in physical / electronic mode, as per 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 summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Act, statutory records, registers, returns, forms etc., and other documents required to be maintained and preserved by the Company both, in physical and / or electronic form under the Companies Act, 2013, or under any other applicable laws or regulations for the time being in force and such other records & returns.
- 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. "electronic mode" shall include "electronic

form” and “electronic record” as defined under the Information Technology Act, 2000, consistent with the Explanation to Rule 3 of the Accounts Rules.

- f. “**Regulations**” means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- h. “**Audit Trail**” means the feature of the accounting or other software that records each and every transaction, creates an edit log of each change made in the Books of Account along with the date when such change was made, and which cannot be disabled.
- i. “**Books of Account**” means the books of account and other relevant books and papers of the Company, as defined under the Act (including Section 2(13) thereof) and the Accounts Rules, including the vouchers and supporting documents relating to the entries therein, whether maintained in physical or electronic mode.

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;
- v. To optimize storage space by disposing of records that are no longer required;
- vi. To ensure compliance with all the regulatory/ statutory obligations specified under introduction section.

D. RESPONSIBILITY

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

E. PRESERVATION PERIOD

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

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)
2	Permanent Records:	Permanently (As per Annexure -1)
3	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.

Note: Documents required to be maintained under any other applicable law should 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 including but not limited to those mentioned under Annexure 1 that are required to be preserved on a permanent basis, shall be preserved in a fire resistant or other such secure cabinets under the custody of the concerned department of the Company.

G. BOOKS OF ACCOUNT AND DIGITISED RECORDS IN ELECTRONIC MODE

G.1 Maintaining Books of Accounts in Electronic Mode

The Company shall maintain its Books of Account in electronic mode in compliance with Section 128 of the Act and Rule 3 of the Accounts Rules.

G.2 Server Location and Storage

- The primary servers (including disaster recovery servers) on which the Books of Account are stored should be physically located in India. Where a Service Provider or cloud hosting is used, the data should be hosted only in data centres / regions located in India.
- The Books of Account should be kept at the registered office or at such other place in India as the Board may decide, in compliance with Section 128 of the Act, including the filing of the prescribed intimation with the Registrar of Companies where the Books of Account are kept at a place other than the registered office.

H. 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), subject to compliance with the applicable laws. 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 destructed documents along with the date of destruction has to be maintained by concerned department(s) permanently.

I. POLICY REVIEW

This Policy shall be reviewed at least once in a year or as frequently as may be required to ensure its effectiveness. In the event of any conflict between the Act or the SEBI Regulations or any other statutory enactments ("Regulations") and the provisions of this policy, the Regulations shall prevail over this policy. Any subsequent amendment / modification in the Regulations, in this regard shall automatically apply to this policy.

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 (including the Books of Account maintained in electronic mode, the Digitised Records of supporting documents such as employee reimbursement claims, vendor invoices and payment records, approvals and other supporting documents, and the Audit Trail of the accounting software/other software.
- Backup logs, archival records, restoration test reports and Service Provider details furnished to the Registrar of Companies in respect of the Books of Account maintained in electronic mode.
- 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
- All documents (loan applications, KYC documents, consent forms, declarations, credit underwriting documents, etc.) obtained as part of extending any of the Company's product or services, should be preserved from the date the customer/ account-based relationship has ended.