



**AADHAR HOUSING FINANCE LIMITED**

**Policy for Preservation of Documents**

**(Revision Effective from January 2024)**

**(Version- IV)**

## **Policy for Preservation of Documents**

### **1. Introduction**

This policy is in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), on preservation of the Documents to aid the employees in handling the Documents efficiently.

Further, the Prevention of Money-laundering (Maintenance of Records) Rules, 2005 (hereinafter referred as “**PMLA**”) also provides for maintenance of records.

Accordingly, the revised Policy on Preservation of Documents has been approved and adopted by the Board at its meeting held in April 2019 to ensure compliance with NHB directions, SEBI regulations and PMLA provisions as applicable to the Company from time to time. The policy has been reviewed by the Board at its meeting held on 9<sup>th</sup> August 2023.

This Policy not only covers the various aspects on preservation of the Documents and keeping record of the same, but also covers for the safe disposal/destruction of the Documents.

### **2. Definitions**

“**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

“**Applicable Law**” means any law, rules, circulars, guidelines or standards under which the preservation of the Documents has been prescribed.

“**Board**” means the board of directors of the Company or its committees.

“**Company**” shall mean “Aadhar Housing Finance Ltd.” (“AHFL”).

“**Documents**” shall mean all papers, records, files, books, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

“**Policy**” means this Policy on Preservation of Documents formulated by the Company.

### **3. Objective of the Policy**

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following three categories:

A. The documents of a **permanent nature** (as per **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (as per **Annexure 2**) shall be preserved by the Company for the term not less than **eight years** after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

C. The records referred to in Rule 3 of PMLA, as applicable to the Company including its subsidiary (ies), shall be maintained for a period of **ten years** from the date of the closure of the account between the client and the Company (list of such records are as per **Annexure 3**).

Audit trail of transactions of all accounts/documents, ledgers and records of transactions on the basis of which CTR, STR or CRR etc. if any, have been filed with FIU will be preserved for fifteen years after the filing of report or till the disposal of court cases, filed based on the report.

#### **4. ROLES & RESPONSIBILITIES**

The respective departmental heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy as mentioned in SEBI regulations/ PMLA Act/NHB and RBI directives as well as Companies Act.

#### **5. MODES OF PRESERVATION**

- The Documents may be preserved either in physical form or electronic form.
- The officer(s) of the Company who is / are generally expected to observe the compliance of requirements of applicable law shall be the person(s) responsible to preserve the Documents.
- The preservation of Documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- The preserved Documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure integrity and confidentiality of the Documents and prohibit unauthorised access.

- The Company shall make appropriate provisions for back up of all Documents preserved both physically and electronically.

## **6. GENERAL**

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

## **7. 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 operation 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 both physical and electronic Documents/records. Destruction of documents can be undertaken periodically with the approval of HOD of the functional department concerned. A list of document and date of destruction of such destroyed documents has to be maintained in the respective department(s).

## **8. COMMUNICATION AND DISSEMINATION OF THE POLICY**

A copy of this policy will be shared to all the relevant stake holders in the company through standard channels of communication.

## **9. AMENDMENTS**

The Board or its committee thereof may, subject to the applicable laws, amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy with a new policy. However, any such amendment or modification shall not be inconsistent with the applicable provisions of any law for the time being in force.

## **10. COMPLIANCE**

All employees of the Company are required to comply with the provisions of this Policy. Failure to comply by any employee of the Company with this Policy may result in disciplinary action by the Company, including suspension or termination of employment.

Any queries regarding this Policy may be referred to the responsible person, who is in charge of administering, enforcing and updating this Policy.

## **11. INTERPRETATION**

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy and procedures.

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### Annexure 1

#### Documents whose preservation shall be permanent in nature

Sl. No.	Nature of Document(s)
1	Registration Certificates
2	Licenses & Statutory Approvals
3	Statutory Registers required under applicable laws
4	Audited financial statements
5	Minutes of General Meeting
6	Minutes of Board Meeting
7	Minutes of various Committee Meetings
8	Material Agreements/Contracts
9	Orders issued by Courts/Statutory bodies
10	Investment Documents/proofs including certificates etc.
11	Any other document as may be required to maintain permanently in terms of Applicable law(s), maintained and preserved from time to time.

### Annexure 2

#### Documents with preservation period of not less than eight years after completion of the relevant transactions

Sl. No.	Nature of Document(s)
1	Books of Accounts (subject to Income Tax Act provisions)
2	Annual Return(s)
3	Personnel Documents
4	Insurance Policies/ Claims under various policies
5	Correspondences with various parties/ Regulators – not required
6	Non-Statutory Registers/Documents
7	Any other document as may be required to maintain in terms of applicable law(s), Maintained and preserved from time to time.

### Annexure 3

#### Documents with preservation period of not less than ten years after the date of closure of the relevant Account/transactions

Sl. No.	Nature of Document(s)
1	Customers' KYC documents
2	Records of transactions & ledger books under PMLA records
3	Personnel information/Documents of staff & customers

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