



DMI FINANCE

POLICY ON PRESERVATION OF DOCUMENTS

OF

DMI FINANCE PRIVATE LIMITED

SUMMARY OF POLICY

Policy Name	Policy for Preservation of Documents
Issue and Effective date	June 14, 2018
Periodicity of Review	Annual
Owner / Contact	Compliance Department
Approver	Board of Directors

Date of Review	Date of Next Review	Comments/Remarks/Changes
September 3, 2021	On or before September 2022	Annual Review and modification of various sections.

1. PREAMBLE:

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 issued by Securities and Exchange Board of India (“SEBI”) (“SEBI LODR”) requires every listed Company to frame a Policy for Preservation of Documents classifying them into two categories:

- (i) Documents whose preservation shall be permanent in nature; and
- (ii) Documents to be preserved for not less than eight years.

DMI Finance Private Limited being a debt listed entity, in compliance with the aforesaid regulation formulated a Policy for Preservation of Documents (“Policy”) duly approved by Board of Directors of the Company (“Board”).

2. SCOPE:

The Policy is formulated to manage the Company’s information in a structured manner, to retain information for as long as it has a business, statutory or regulatory requirement, and to protect information which is vital for the Company considering their importance, usefulness and information.

3. DEFINITIONS:

- a) **“Act”** means the Companies Act, 2013.
- b) **“Applicable Law”** means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA), the Institute of Company Secretaries of India (ICSI) and other professional/regulatory/statutory bodies under which the preservation of documents has been prescribed.
- c) **“Board”** means the Board of the Directors of the Company.
- d) **“Books of Accounts”** includes records maintained in respect of –
 - (i) all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place
 - (ii) All sales and purchases of goods and services by the Company
 - (iii) The assets and liabilities of the Company; and
 - (iv) The items of cost as may be prescribed under section 148 of the Act in case the Company belongs to any class of companies specified under that section.
- e) **“Company”** means DMI Finance Private Limited.
- f) **“Documents”** refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained in Electronic or physical Form.
- g) **“Electronic Form”** means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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.
- h) **“Maintenance”** means keeping documents, either physically or in Electronic Form.
- i) **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

- j) “SEBI LODR” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

4. APPLICABILITY AND MODES OF PRESERVATION:

This Policy is applicable to all business documents of the Company, including written, printed and recorded matter and electronic forms. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

This Policy extends to all location of the Company.

5. ROLES & RESPONSIBILITIES:

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

6. AUTHENTICITY:

Where a document is being maintained both in physical form and electronic form, the authenticity with reference to the physical form should be considered for every purpose.

7. DESTRUCTION OF DOCUMENTS:

The documents specified in **Annex- A** which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads. Any deviation will be approved by the Chief Financial Officer.

8. DISSEMINATION OF THE POLICY:

The approved Policy shall be uploaded on the Company’s website www.dmifinance.com.

9. 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.

10. REVIEW OF POLICY:

The Policy shall be amended or modified with approval of the Board. The Policy shall be reviewed from time to time. Consequent upon any amendments in Applicable Laws or any change in the position of the Company, necessary changes in this Policy shall be incorporated. Such changes shall be brought to the notice of the Board in the meeting convened immediately after such change.

Notwithstanding anything contained in this Policy, in case of any contradiction of the provision of this Policy with any existing legislations, rules, regulations, laws or modification thereof or enactment of a new applicable law, the provisions under such law, legislation, rules, regulation or enactment shall prevail over this Policy.

Annexure-A

Statutory Records as per Companies Act, 2013		
S. No.	Record Type	Preservation Period
1.	Memorandum and Articles of Association	Permanent
2.	Certificate of Incorporation	Permanent
3.	Minutes of Board and Committee Meetings	Permanent
4.	Minutes of Shareholders' Meetings	Permanent
5.	Register and Index of Members	Permanent
6.	Resolutions passed by circulation	8 Financial Years
7.	Listing Agreement executed with the stock exchanges	Permanent
8.	Attendance Register – Board and Committee Meetings	8 Financial Years
9.	Register of investments in securities not held in the name of the Company	Permanent
10.	Register of renewed and duplicate certificates	Permanent
11.	Register of contracts in which Directors are interested	Permanent
12.	Register of Directors, Managing Director, Manager and Secretary	Permanent
13.	Register of Directors' Shareholding	Permanent
14.	Register of Inter-corporate loans and investments	Permanent
15.	Register of transfer of shares	Permanent
16.	Register of Transmission of shares	Permanent
17.	Forms filed with Registrar of Companies (ROC)	Permanent
18.	Notice and Agenda of the Board and Committee Meetings	8 Financial Years
19.	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years

20.	Annual Returns	8 Financial Years
21.	Correspondence with shareholders	8 Financial Years
22.	Disclosures under SEBI – Prohibition of Insider Trading Regulations	8 Financial Years
23.	Postal Ballot forms	8 Financial Years
24.	Scrutinizer’s Reports on voting at General Meetings/ Postal Ballot	8 Financial Years
25.	Newspaper cuttings of notices of Board Meeting and Financial Results	8 Financial Years
26.	Investor meet presentations	8 Financial Years

Accounts and Finance Records

S. No.	Record Type	Preservation Period
1.	Annual Audited and Financial Statements	Permanent
2.	Books of Accounts, Ledgers & Vouchers	8 Financial Years
3.	Investment Records	8 Financial Years from the date of redemption
4.	Engagement letters from Auditors	8 Financial Years

Accounts and Finance Records

S. No.	Record Type	Preservation Period
1.	Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return.	8 Financial Years
2.	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax	8 Financial Years