



POLICY ON PRESERVATION OF DOCUMENTS

OF

DMI FINANCE PRIVATE LIMITED

1. **PREAMBLE:**

Pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 issued by Securities and Exchange Board of India ("SEBI") ("**SEBI LODR**") and Companies Act, 2013 including rules framed therein ("**Act**") (as amended from time to time) read with Prevention of Money Laundering Act, 2002 including rules framed therein, the Board of Directors ("**Board**") of the Company has framed a Policy for Preservation of Documents ("**Policy**") classifying them into three categories:

- (i) Documents whose preservation shall be permanent in nature;
- (ii) Documents to be preserved for not less than 8 (Eight years); and
- (iii) Documents to be preserved for not less than 10 (Ten years).

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 contained therein.

3. **DEFINITIONS:**

- a) "**Act**" means the Companies Act, 2013 including rules made therein.
- 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 no longer required or 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.

Further, any documents required to be maintained for a period of less than 8 years under any applicable law, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads.

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. | Listing Agreement executed with the stock exchanges | Permanent |
| 7. | Register of investments in securities not held in the name of the Company | Permanent |
| 8. | Register of renewed and duplicate certificates | Permanent |
| 9. | Register of contracts in which Directors are interested | Permanent |
| 10. | Register of Directors, Managing Director, Manager and Secretary | Permanent |
| 11. | Register of Directors' Shareholding | Permanent |
| 12. | Register of Inter-corporate loans and investments | Permanent |
| 13. | Register of transfer of shares | Permanent |
| 14. | Register of Transmission of shares | Permanent |
| 15. | Forms filed with Registrar of Companies (ROC) | Permanent |
| 16. | Resolutions passed by circulation | 8 Financial Years |
| 17. | Attendance Register – Board and Committee Meetings | 8 Financial Years |
| 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 |

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| 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. | Investors meet presentation | 8 Financial Years |

| Accounts and Finance Records | | |
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| 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 |

| Taxation Records | | |
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| 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 |

Records to be Maintained under Section 12 of PMLA read with Prevention of Money-Laundering (Maintenance of Records) Rules, 2005 ("PML Rules") (as amended from time to time)

| S. No. | Record Type | Preservation Period |
|---------------|--|----------------------------|
| 1. | <p>Transactions as referred in clause (a) of Sub-section (1) of Section 12 of PMLA read with Rule 3 of the PML Rules:</p> <p>(A) all cash transactions of the value of more than rupees ten lakhs or its equivalent in foreign currency;</p> <p>(B) all series of cash transactions integrally connected to each other which have been individually valued below rupees ten lakh or its equivalent in foreign currency where such series of transactions have taken place within a month and the monthly aggregate exceeds an amount of ten lakh rupees or its equivalent in foreign currency;</p> <p>(BA) all transactions involving receipts by non-profit organizations of value more than rupees ten lakh, or its equivalent in foreign currency;</p> <p>(C) all cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine or where any forgery of a valuable security or a document has taken place facilitating the transactions;</p> <p>(D) all suspicious transactions whether or not made in cash and by way of-</p> <p>(i) deposits and credits, withdrawals into or from any accounts in whatsoever name they are referred to in any currency maintained by way of—</p> <p>(a) cheques including third party cheques, pay orders, demand drafts, cashiers cheques or any other instrument of payment of money including electronic receipts or credits and electronic payments or debits, or</p> <p>(b) travellers cheques, or</p> <p>(c) transfer from one account within the same banking company, financial institution and intermediary, as the case may be, including from or to Nostro and Vostro accounts, or</p> | 10 years |

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| | <p>(d) any other mode in whatsoever name it is referred to;</p> <p>(ii) credits or debits into or from any non-monetary accounts such as d-mat account, security account in any currency maintained by the banking company, financial institution and intermediary, as the case may be;</p> <p>(iii) money transfer or remittances in favour of own clients or non-clients from India or abroad and to third party beneficiaries in India or abroad including transactions on its own account in any currency by any of the following:-</p> <p>(a) payment orders, or (b) cashiers cheques, or (c) demand drafts, or (d) telegraphic or wire transfers or electronic remittances or transfers, or (e) internet transfers, or (f) Automated Clearing House remittances, or (g) lock box driven transfers or remittances, or (h) remittances for credit or loading to electronic cards, or (i) any other mode of money transfer by whatsoever name it is called;</p> <p>(iv) loans and advances including credit or loan substitutes, investments and contingent liability by way of:</p> <p>(a) subscription to debt instruments such as commercial paper, certificate of deposits, preferential shares, debentures, securitized participation, inter bank participation or any other investments in securities or the like in whatever form and name it is referred to, or (b) purchase and negotiation of bills, cheques and other instruments, or (c) foreign exchange contracts, currency, interest rate and commodity and any other derivative instrument in whatsoever name it is called, or (d) letters of credit, standby letters of credit, guarantees, comfort letters, solvency certificates and any other instrument for settlement and/or credit support;</p> <p>(v) collection services in any currency by way of collection of bills, cheques, instruments or any other mode of collection in</p> | |
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| | <p>whatsoever name it is referred to.</p> <p>(E) all cross border wire transfers of the value of more than five lakh rupees or its equivalent in foreign currency where either the origin or destination of fund is in India;</p> <p>(F) all purchase and sale by any person of immovable property valued at fifty lakh rupees or more that is registered by the reporting entity, as the case may be.</p> | |
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