

EQUITAS HOLDINGS LIMITED

DOCUMENT RETENTION & ARCHIVAL POLICY

1. PREAMBLE:

This Policy deals with the retention and archival of the corporate records of Equitas Holdings Limited in accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

1.2 OBJECTIVE:

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements. This policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records. The Chief Financial Officer and the Compliance Officer jointly would be responsible for overseeing the implementation of the Policy.

2. DEFINITIONS

- a) Act: "Act" means the Companies Act, 2013 including any amendment or modification thereof.
- b) Board: Board means Board of Directors of the Company
- c) Chief Financial Officer: "Chief Financial Officer" means a person appointed as the Chief Financial Officer of the Company under the Companies Act 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- d) Company: "Company" means Equitas Holdings Limited.
- e) Compliance Officer: "Compliance Officer" means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- f) Director: "Director" means a person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed as a Director in the Company.
- g) Document: "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- h) Employees: "Employees" shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.

i) Key Managerial Personnel: “Key Managerial Personnel” shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.

j) Regulations: “Regulations” shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015

k) Secretarial Standards: “Secretarial Standards” means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.

l) Stock Exchange or Exchanges: “Stock Exchange or Exchanges” shall mean BSE Limited and National Stock Exchange of India Limited

m) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

3. GOVERNING LAWS

This policy shall be governed by the Companies Act 2013, SEBI Act, Rules and Regulations, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

4. CLASSIFICATION LAWS

Documents required to be maintained by the Company shall be classified in the following categories:

a) Mandatory under governing laws

b) Non-Mandatory

1. Documents which are required to be mandatorily maintained and preserved by the Company shall be preserved for such duration as may be specified by the relevant statute or regulation, as the case may be.

2. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.

3. All the documents, records that are statutorily required to be hosted on the website of the Company as per SEBI regulations or other applicable law, shall be hosted on the website for a minimum period of five (5) years or for such period as may be mentioned in the relevant law, whichever is longer.

4. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

5. PRESERVATION OF DOCUMENTS / RECORDS

Subject to clause 4 above, the Minimum Retention Requirement of the different categories of the Company records is provided in the Retention Schedule which is disclosed by way of Annexure to this Policy.

6. CUSTODY OF DOCUMENTS

All documents shall be under the custody of respective head of the departments as detailed below:

Sl. No.	Documents	Authorised persons
1	Tax / Accounting Records / Financial Statements	CFO
2	Minutes / Statutory Registers	Company Secretary & Compliance Officer
3	Employment / personal Records / Lease Documents / Contracts	Head-HR
4	Customer Transaction documents & KYC documents	Head-Operations
5	Legal Documents	Head-Legal
6	Intellectual Property	Head- IT

7 AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

ANNEXURE- RETENTION SCHEDULE

Sl No.	Record Category	Record Type	Retention Requirement
1	Board Meeting & Committee Meeting records	1. Minutes of the meeting of Board of Directors and Committee constituted by the Board	Permanent
2	General Meeting records	1. Register & Index of members 2. Minutes	Permanent
3	Other Secretarial Records	1. Incorporation / Conversion/ Business commencement Certificates. 2. Memorandum of Association & Articles of Association. 3. Various Statutory Registers pursuant to the Companies Act, 1956 and/or Companies Act, 2013. 4. Share Transfer, transmission etc. correspondences with the Registrar & Share Transfer Agent.	Permanent
		1. Non-statutory Registers under the Companies Act, 1956 and/or Companies Act, 2013 2. Attendance register of Board of Directors Meeting and General Meetings 3. Register and index of Debenture-holders	8 years from the Financial Year in which the latest entry is made. 8 years from the Financial Year in which the latest entry is made 15 years after the redemption of debentures
		1. Copies of all annual returns alongwith certificates & documents required to be annexed thereto.	8 years from the date of filing with the Registrar.
4	Insurance records	1. Insurance Policy Execution/Renewal Certificate 2. Insurance Claims under various Policies	5 years from lapse of the Policy/ settlement of claim.

SI No.	Record Category	Record Type	Minimum Retention Requirement
5	Contracts/Agreements/Purchase Orders	1. Renewal 2. Modification 3. Termination of : Contracts/ Agreements/ Purchase Order	8 years from termination of Contract/Agreement/completion of purchase.
6	Loan Agreements with the Clients	1. Agreement 2. Modification 3. Loans involving mortgage of property 4. Title Deeds deposited by borrowers	8 Years 8 Years 12 Years Permanent till the customer takes it back.
6	SEBI & Stock Exchange Records	1. Listing Agreement 2. Statutory Returns/Reports etc. submitted from time to time	Permanent 8 years
7	RBI Records	1. License Certificate/ Renewal Certificate	Permanent
		1. Client Records & transactions pursuant to the 'Know Your Customer' (KYC) Guidelines – Anti Money Laundering Standards (AML) - 'Prevention of Money Laundering Act, 2002	8 years after completion of the relevant transactions
		2. Records pertaining to the identification of the customers and their address (e.g. copies of documents like passports, identity cards, driving licenses, PAN card, utility bills, etc.) obtained while opening the account and during the course of business relationship.	8 years after the business relationship ended
		3. Records pertaining to complex, unusual large transactions and all unusual patterns of transactions, which have no apparent economic or visible lawful purpose.	8 years after the business relationship ended
		3. Statutory Returns/Reports etc. submitted from time to time.	8 years

SI No.	Record Category	Record Type	Minimum Requirement	Retention
8	Misc Licenses obtained from Statutory Authorities	-	Permanent	
9	Property Records	1. Agreements/ Contracts 2. Documents relating to acquisition and sale of Real Property.	Permanent	
10	Legal	Correspondence with Courts/ other statutory bodies regarding any petition/ case/suit etc.	5 years from the date of decree	
11	Personnel Records	1. Official Personnel Files of Active Employees	To be retained during active employment	
		1. Official Personnel Files of inactive Employees	3 years from the date of termination of employment.	
12	Labour Law records	1. Registration/ Renewal Certificate under various Acts relating to Labour laws. 2. Maintenance of various Registers under the various acts in force read with the Rules made thereunder, relating to Labour laws.	Permanent 3 years or such period as may be prescribed from time to time	
13	Finance	1. Audited Financial Statements 2. Auditors Reports 3. Books of Accounts & Vouchers	8 financial years following the relevant Financial Year.	
14	Taxation	1. Registration/Amendment Certificate under various relevant provisions in force.	Permanent	
		Preservation of specific books of accounts	8 financial years following the relevant Financial Year.	
15	Other documents not covered herein above	Records pertaining to various other laws in force	As required under various other laws in force, from time to time.	