

## ARCHIVAL POLICY

### INTRODUCTION

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) has imposed certain obligations and disclosure requirements on all listed entities. This Policy has been formulated in pursuance of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

### DEFINITIONS

“**Board of Directors**” or “**Board**” shall mean the Board of Directors of the Company, as constituted from time to time.

“**Company**” shall mean Savani Finance Limited.

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

“**SEBI Listing Regulations**” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

### AUTHORIZED PERSONNEL

The Managing Director and the Compliance Officer shall be responsible for maintaining and implementing the framework under this Policy.

### OBJECTIVE

The objective of this policy is to have a binding framework for the preservation of documents of the Company and subsequent archival of such documents, as approved by the Board of Directors of the company, which shall classify them in at least two categories as follows:

The documents of a permanent nature 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 (**Annexure A**).

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

The documents to be maintained and preserved for a specified time after completion of the relevant transactions 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 **(Annexure B)**.

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

The company may, as it deems fit and possible from time to time, maintain above mentioned documents in electronic form to the extent possible.

For ensuring safety of the data hosted on the website of the Company, a back-up of the website shall be taken on regular intervals.

#### **PLACE OF PRESERVATION**

Records shall be preserved / maintained at the Registered Office of the Company unless any law specifically permits us to keep them at any other place administratively convenient to the Company.

Records created in physical form may be scanned and maintained in electronic form as well. Electronic communication can be maintained on the Company server in year wise folders, with access restricted to certain sections/ departments to prevent tampering of documents.

Further, the safety of these Records in electronic form is to be archived as per the relevant IT policy of the Company.

#### **AUTHORITY TO MAKE ALTERATION TO THE POLICY**

Any director of the Company or the Company Secretary is authorized to make such alteration to this policy as considered appropriate, however, subject to the condition that such alteration shall be in accordance with applicable laws, including the provisions of the Companies Act, 2013, as amended (the "Companies Act") and the SEBI Listing Regulations.

#### **DISPOSAL 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 Managing Director and/or Compliance Officer. Disposal of documents as a normal administrative practice will be followed for the records which are duplicate/ unimportant/ irrelevant.

This applies to both Physical and Electronic Documents.

#### **ACCESS/RETRIEVAL**

The Authorized Personnel shall have the right of access to the archived documents.

#### **POLICY REVIEW**

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for noting at a meeting of the Board.

**ANNEXURE A**

**Documents to be preserved permanently**

The Company shall preserve the following documents permanently:

| <b>Sr. No.</b> | <b>Description of the Document</b>   | <b>Remarks</b>  |
|----------------|--|---|
| i.             | Certificate of Incorporation   | Original and Scanned copies   |
| ii.            | Certificate of Commencement of Business  | Original and Scanned copies   |
| iii.           | Memorandum & Articles of Association, as amended from time to time   | Printed Copies and/or scanned copies  |
| iv.            | Minutes of the meetings of the Shareholders, Board and Committees  | Original signed as per the relevant regulations (physical or electronic)  |
| v.             | Statutory Registers as applicable under Companies Act, 2013  | Physical or Electronic  |
| vi.            | Licenses/ Registration Certificates issued by various authorities relating to Income Tax, Service Tax, local bodies, Employees Provident Fund, Registrar of Companies. | As far as possible originals shall be preserved except where the same is surrendered to the authorities for getting a new certificate or otherwise. In such cases certified copies or photocopies shall be preserved. |
| vii.           | Accounting and other operating manuals as amended from time to time.   | Original or copies  |
| viii.          | Annual Reports   | Printed or Photocopies (at least one copy) or scanned copy  |
| ix.            | Agreements which do not specify any validity period and have permanent force   | Original or copies  |
| x.             | Prospectus, Letters of Offer and other similar documents   | Printed or scanned copies   |
| xi.            | Other documents as may be prescribed under any law for the time being in force to be preserved permanently.  | The relevant statutory requirements to be complied with.  |

**ANNEXURE B**

**Documents to be preserved for not less than Eight years**

The following documents shall be preserved for a period of not less than Eight years-

| <b>Sr. No.</b> | <b>Description of Document</b>   |
|----------------|--|
| i.             | All books of accounts and related records  |
| ii.            | Income Tax Returns, Assessment Orders and other related documents  |
| iii.           | Service Tax Records  |
| iv.            | Payroll Records  |
| v.             | Annual Returns filed under the Companies Act, 1956/2013  |
| vi.            | Other Documents as may be prescribed under any law for the time being in force to be preserved for not less than 8 years |