



## RAMCHANDRA LEASING & FINANCE LIMITED

### POLICY ON PRESERVATION OF DOCUMENTS

#### RAMCHANDRA LEASING AND FINANCE LIMITED

##### BASE DOCUMENT

Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

##### CONTENTS

1. Scope .....	2
2. Definitions .....	2
3. Coverage .....	2
4. Classification .....	3
5. Modes of preservation .....	3
6. Custody of the Documents .....	3
7. Authority for approval of Policy .....	3
8. Authority to make alterations to the Policy .....	3
9. Destruction of Documents .....	3
10. Conversion of the form in which the Documents are preserved .....	3
11. Authenticity .....	3
12. Interpretation .....	4
Annexure -I .....	5
Annexure- II .....	7
Annexure- III .....	7



## RAMCHANDRA LEASING & FINANCE LIMITED

### PREAMBLE

This Policy on Preservation of Documents ("Policy") is formulated pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Companies Act, 2013 and other applicable laws. The purpose of this Policy is to ensure systematic identification, maintenance, preservation, retention and destruction of documents of Ramchandra Leasing and Finance Limited ("the Company").

This Policy supersedes any earlier policy or practice on preservation of documents adopted by the Company. This Policy shall be read in conjunction with applicable laws and other internal policies of the Company.

### 1. SCOPE

This Policy provides a framework for preservation, maintenance, storage and disposal of documents to ensure safe-keeping of records, prevent misuse or loss, and avoid unnecessary accumulation of documents. It applies to all documents maintained by the Company in physical or electronic form.

### 2. DEFINITIONS

2.1 "**Act**" means the Companies Act, 2013 and rules made thereunder.

2.2 "**Applicable Law**" means any statute, law, regulation, rule, circular, guideline or standard issued by the Government of India, SEBI, RBI or any other statutory or regulatory authority applicable to the Company.

2.3 "**Authorised Person**" means any person authorised by the Board of Directors to preserve, maintain or destroy documents under this Policy.

2.4 "**Board**" means the Board of Directors of Ramchandra Leasing and Finance Limited or any Committee thereof.

2.5 "**Company**" means Ramchandra Leasing and Finance Limited.

2.6 "**Current Documents**" means documents having ongoing relevance, including those relating to litigation, investigations, contracts or regulatory matters.

2.7 "**Documents**" means records, papers, agreements, notices, forms, correspondence, registers, minutes, electronic records or any other documents required to be maintained under Applicable Law, whether in physical or electronic form.

2.8 "**Electronic Records**" shall have the meaning assigned under the Information Technology Act, 2000.

2.9 "**Maintenance**" means keeping documents in physical or electronic form.

2.10 "**Preservation**" means maintaining documents in good order to prevent alteration, damage or destruction.

Words not defined herein shall have the meanings assigned under Applicable Law.



## RAMCHANDRA LEASING & FINANCE LIMITED

### 3. COVERAGE

This Policy applies to all documents generated, received or maintained by the Company in the course of its business operations.

### 4. CLASSIFICATION OF DOCUMENTS

Documents shall be preserved as follows:

- a) Documents required to be preserved permanently under Applicable Law – permanently;
- b) Documents required to be preserved for a specific period under Applicable Law – for such prescribed period;
- c) Other documents – for a period of at least five (5) years or such longer period as may be determined by the Authorised Person, based on relevance.

An indicative list of documents and their preservation period is provided in Annexure I.

### 5. MODES OF PRESERVATION

Documents may be preserved in:

- a) Physical form; and/or
- b) Electronic form.

Preservation shall ensure integrity, authenticity and accessibility of documents and prevent unauthorised access or tampering.

### 6. CUSTODY OF DOCUMENTS

Custody of documents shall vest with the Authorised Person. Upon resignation or transfer, the Authorised Person shall hand over custody and access credentials to the person authorised by the Board.

### 7. AUTHORITY FOR APPROVAL

The Board of Directors shall have the authority to approve this Policy pursuant to Regulation 9 of the SEBI (LODR) Regulations, 2015.

### 8. AUTHORITY TO AMEND

The Board may amend or modify this Policy from time to time in accordance with Applicable Law.

### 9. DESTRUCTION OF DOCUMENTS

Documents which are no longer required to be preserved shall be destroyed in a systematic manner with prior approval of the Board or Authorised Person, as applicable. A register of documents destroyed shall be maintained in the format prescribed in Annexure III.

### 10. CONVERSION OF FORM

Physical documents may be converted into electronic form with prior approval of the Authorised Person or the Board.

## **11.AUTHENTICITY**

Where documents are maintained in both physical and electronic form, the physical document shall prevail unless otherwise provided under Applicable Law.

## **12.INTERPRETATION**

In case of conflict between this Policy and Applicable Law, the provisions of Applicable Law shall prevail.



## RAMCHANDRA LEASING & FINANCE LIMITED

### ANNEXURE I – INDICATIVE LIST OF DOCUMENTS AND PRESERVATION PERIOD

(As per Companies Act, 2013, SEBI (LODR) Regulations, 2015, Secretarial Standards, Income Tax Act and other applicable laws)

#### 1. Companies Act, 2013

##### A. Permanent Preservation

- Certificate of incorporation and subsequent changes thereto.
- The Memorandum and Articles of the company
- Affidavit from the subscribers to the Memorandum and from persons named as the first directors
- Register of members
- Books and Documents relating to the issue of share certificates, including the blank forms of share certificates
- The foreign register of members, if any
- Minutes book of general meeting
- Minutes book for meetings of the Board and Committees constituted by it.
- Such other registers / documents as may be required to be maintained permanently under the Act.

##### B. Temporary Preservation

- Register of Charges (8 years)
- Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)
- Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)
- Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)
- All notices pertaining to disclosure of interest of directors (3 years)
- All certificates surrendered to a company (3 years from date of surrender)
- Register of deposits (not less than 8 years from the date of last entry)
- Instrument creating a charge or modification (8 years from date of satisfaction of charge)
- Such other registers / documents as may be required to be maintained under the Act for the periods stipulated there under.
- Annual Reports, Forms filed with the Registrar of Companies. (8 years)
- Approvals/ consent received from authorities. (8 years)

#### 2. Secretarial Standard

##### A. Permanent Preservation

- Minutes of Board meeting (SS-1)

##### B. Temporary Preservation

- Office copies of Notices, scrutinizer's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2)



## RAMCHANDRA LEASING & FINANCE LIMITED

### 3. Income Tax Act, 1961

#### A. Permanent Preservation

- Permanent Account Number (PAN)

#### B. Temporary Preservation

- Records pertaining to tax assessment appeals, penalties, tax deducted at source, challans for payments, acknowledgements for tax returns filed for the period of time stipulated under law.

### 4. Registration certificates under Sales Tax / VAT and amendments thereto

- Records pertaining to assessment appeals, penalties, challans for payments, acknowledgements for tax returns filed for the period of time stipulated under law.

### 5. Documents to be maintained permanently under any law / enactment impacting the company

- Books of accounts of the company, vouchers supporting documents including those maintained electronically, signed copy of audited statements of accounts of the company (for a period of 8 years).

### 6. Office copies of Notices, Agenda, Notes on Agenda, acknowledgement of

- Directors, proof of sending letters/ Minutes to Directors, their comments on Minutes and other related papers relating to Meeting of the Board / Committees constituted by the Board.
- As per Secretarial Standards – 1 issued by the Institute of Company Secretaries of India, these documents shall be preserved in good order in physical or electronic form for as long as they remain current or for 8 Financial Years whichever is later and may be destroyed thereafter with approval of the Board.

### 7. Copies of returns, documents intimations regarding events disclosed to Stock Exchanges under SEBI (Listing Obligations and Disclosures Requirements) Regulations 2015

- The disclosures made to the Stock Exchanges shall be hosted on the website of the Company, for minimum period of 5 years and thereafter the physical copies of such documents have also the disclosures on the website shall be destroyed with the approval of the Board.

### 8. Audio-Visual tape recordings or other electronic mechanism in connection with attendance of directors at Board Meetings / Committee Meetings of the Board through video conferencing facility.

- To be preserved at least before the completion of Audit for that particular year in accordance with Rule 3 of Companies (Meetings of Board) Rules, 2014.

Thereafter these can be destroyed with the approval of the Board.



## RAMCHANDRA LEASING & FINANCE LIMITED

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Vadodara - 390 001

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Opp. Goyal Shopping Centre.  
Borivali (W), Mumbai - 400092.





## RAMCHANDRA LEASING & FINANCE LIMITED

### ANNEXURE II – DOCUMENTS FOR NORMAL DESTRUCTION

**The following categories of Documents may be destroyed as per normal administrative procedure of the company:**

- Brochures;
- Copies of press cuttings, press statements or publicity material;
- Letters of appreciation or sympathy, or anonymous letters;
- Requests for copies of maps, plans, charts, advertising material (subject to Clause 9 and 10 of this Policy);
- Facsimiles where a photocopy has been made;
- Telephone/Fax message;
- Drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 9 and 10 of this Policy); and
- Routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 9 and 10 of this Policy)
- As per the SEBI Regulations (Regulation 9), all the disclosures made by the company to the stock exchanges shall be also hosted on the company's web site for a minimum period of 5 years where after they can be destroyed with the approval of the Board.

### ANNEXURE III – REGISTER OF DOCUMENTS DESTROYED

**The format of the register of Documents disposed / destroyed:**

Particulars of document along with provision of applicable law	Date and mode of destruction	Initials of the authorised person