

## POLICY FOR PRESERVATION AND RETRIEVAL OF DOCUMENTS AND RECORDS/ ARCHIVAL POLICY

### 1. INTRODUCTION

Securities and Exchange Board of India (SEBI) has introduced SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015 (“Listing Regulations”), in substitution and complete exclusion of the prevailing Listing Agreement entered into by the Company with the Stock Exchanges.

In pursuance of provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015 (“Listing Regulations”), Lead Financial Services Limited (hereinafter the Company) is required to formulate and adopt a policy for preservation of documents.

Accordingly, this “**Policy for Preservation and Retrieval of Documents and Records/ Archival Policy**” is adopted by Board of Directors in their meeting held on 5<sup>th</sup> November, 2015, to be applicable and effective on the Company from 2<sup>nd</sup> December, 2015.

### 2. OBJECTIVE

The objective of this Policy is to ensure that Company’s documents and records will remain authentic and accessible in the future to anyone who needs them.

The purpose of this policy is to state the principles that guide the care and preservation of Documents. It concerns all materials in all formats including digital records. This policy provides a comprehensive framework for decision making in respect to preservation of documents and for the development of procedures.

### 3. DEFINITIONS

The following terms are used in this Policy with the meaning specified:

- 3.1. “Act” means the Companies Act, 2013 or any statutory modification or re-enactment thereof and includes any Rules and Regulations framed thereunder.
- 3.2. “Articles” means the Articles of Association of a company, as originally framed or as altered from time to time, including, where they apply, the Regulations contained in the Tables in Schedule I to the Act.
- 3.3. “Board” means the Board of Directors of a company.
- 3.4. “Committee” means a committee of the Board.
- 3.5. “Entry” includes correction thereof.

- 3.6. "Listing Regulations" means the SEBI (Listing Obligations and Disclosure Requirements) Regulation 2015 or any statutory modification.
- 3.7. "Maintenance" means keeping registers and records, either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such registers and records.
- 3.8. "Preservation" means to keep in good order; to prevent from being damaged or destroyed, from fire or otherwise.
- 3.9. "Record" means a documentary evidence of past events or transactions.
- 3.10. "Register" means a register maintained under the Act or the SEBI Act and includes registers referred to in this Secretarial Standard.
- 3.11. "SEBI Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992) or any statutory modification or re-enactment thereof and includes any rules, regulations and guidelines framed thereunder.

Words and expressions used herein but not defined shall have the meaning respectively assigned to them under the Act, unless otherwise stated.

#### 4. Documents and their preservation period

##### i. Documents whose preservation shall be permanent in nature:

All the documents of the Company required by law or rules to be maintained or preserved permanently, include but not limited to, the following:

Sl. No.	Particulars of Documents
i.	Minutes book of meetings of the Board of Directors
ii.	Minutes book of meetings of Committees of the Board
iii.	Minutes book of General Meetings of the members including resolutions passed by postal ballot
iv.	Minutes book of the meetings of creditors
v.	Register of Members along with Index thereof
vi.	Register of Renewed and Duplicate Share Certificates
vii.	Register of Charges
viii.	Register of investments not held in its own name by the Company, if any
ix.	Register of contracts with related party and contracts and Bodies etc. in which directors are interested
x.	Certificate of incorporation and commencement of business
xi.	Register of Directors and Key Managerial Personnel and their Shareholding
xii.	Books and documents relating to issue of share certificates, in case of disputed cases
xiii.	Documents relating to incorporation and changes in any of the clauses of the Memorandum and Articles of Association

**ii. Documents where preservation period is atleast eight years after completion of the relevant transactions/periods.**

The following documents shall be preserved for the time period mentioned against the documents:

Sl. No.	Particulars of Documents	Preservation Period
i.	Books of Accounts together with relevant vouchers	8 Financial Years
ii.	Attendance Register for the Meetings of the Board and its Committees	8 Financial Years
iii.	Attendance Register of General Meetings	8 Financial Years
iv.	Register of debenture holders/other securities holders along with Index thereof	8 years from the date of redemption of debentures or securities
v.	Register of Deposits accepted and renewed	8 year from the financial year in which the latest entry is made in the register
vi.	Register of Proxies	8 Years
vii.	Office copies of Notices, Agenda, Notes on Agenda and other related papers of Board and its Committee meetings	8 Financial Years
viii.	Office copies of Notices, scrutiniser's reports and related papers of General Meetings and postal ballot	8 Financial Years
ix.	Register of Employee Stock Options	8 year from the financial year in which last outstanding stock option have been either exercised or lapsed / cancelled
x.	Instruments creating or modifying the charge	8 years from the date of satisfaction of charge
xi.	Annual Returns prepared under section 92 of the Companies Act, 2013 and copies of all certificates and documents annexed thereto.	8 years from the date of filing with the Registrar of Companies
xii.	Disclosure of interest by Directors	8 Financial Years
xiii.	Shareholding pattern filed with the Stock Exchanges	8 Financial Years
xiv.	Corporate Governance Report submitted to the Stock Exchanges	8 Financial Years
xv.	Reconciliation of share capital audit reports submitted to the Stock Exchanges	8 Financial Years
xvi.	Any other documents submitted or disclosures made to the Stock exchanges	8 Financial Years
xvii.	Books relating to the issue of share certificates (other than in case of disputed cases)	30 years

xviii.	Documents filed with Registrar of Companies or Ministry of Corporate Affairs (other than the documents which are required to be maintained permanently)	8 Financial Years
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Respective Departmental Heads shall be the Custodians for relevant records and shall maintain a Register with proper indexing for the same. Further there will be a documented hand-over of Custodianship for long-term absence due to leave or change of Departmental Head (with hand-over confirmed in the take-over letter).

The documents mentioned above may be destroyed after expiry of the period mentioned against the respective documents after obtaining the approval of the Chairman and a record shall be maintained in this regard by the Compliance Officer;

Provided that if it is prescribed under any law, regulation or Secretarial Standard on Meetings of the Board of Directors or Secretarial Standard on General Meetings that a particular documents can be destroyed only after taking approval of the Board of Directors, such document shall be destroyed only after taking approval of the Board of Directors.

**iii Other Documents**

In case any other document is required by any law or regulation to be maintained permanently or for a specific period of time, it shall be so maintained by the Company. IT Head/IT Department to ensure regular back-up of the Computers, Hard Disk etc.

**5. COMPLIANCES**

The Company shall comply with the requirements of Listing Regulations amended time to time and Companies Act, 2013, in respect of each of its Documents/Record/Statutory registers and other papers identified in terms of this Policy. In addition, the policy will also extend to keeping the records in electronic mode.

**6. AMENDMENT**

This Policy can be amended, modified, revised or abrogated by the Board of Directors of the Company from time to time.

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