



(CIN:U74899DL1994PLC062407)

## **POLICY ON PRESERVATION OF DOCUMENTS FOR OPERATION AND ACCOUNTING ACTIVITIES**

### **SCOPE AND PURPOSE**

Prevention of Money-laundering (Maintenance of Records) Rules, 2005 (hereinafter referred as "PMLA") also provides for retention of records for a specified time.

Accordingly, this Policy on Preservation of Documents has been approved and adopted by the Board of Directors of the Company.

The provisions of the Company shall be applicable to all subsidiaries (including registered NBFCs) of the Company.

### **DEFINITIONS**

#### **A. "Board of Directors" or "Board"**

Board of Directors or Board shall mean the Board of Directors of Dhani Loans and Services Limited, as constituted from time to time.

#### **B. "Company"**

Company shall mean "Dhani Loans and Services Limited".

#### **C. "Documents"**

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

### **OBJECTIVE**

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A. The documents of a permanent nature (as per **Annexure 1**) 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.

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

- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (as per **Annexure-2**) 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.

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

Provided further that the Company may keep the documents as specified above in an electronic mode.

- C. *Retention of records in compliance with the Provisions of PMLA*

The records referred to in Rule 3 of PMLA, as applicable to the Company including its subsidiaries, shall be maintained for a period of **ten years** from the date of the closure of the account between the client and the Company (as per **Annexure-3**).

Rejected loan applicant's KYC documents and other particulars furnished by the client shall be preserved for a period for **ten years** from the date of rejection.

Audit trail of transaction of all documents, ledgers and records of transactions on which CTR, STR or CRR have been filed with FIU will be preserved for **fifteen years** after the filing of report or till the disposal of court cases, if any, filed based on our report.

## **ROLES & RESPONSIBILITIES**

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy as mentioned in PMLA Act and RBI directives as well as Companies Act.

## **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.

## **DESTRUCTION 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 department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are

duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents. Periodically destruction of documents can be undertaken with the approval of HOD of the concerned department. A list of documents and date of destruction of such destroyed documents has to be maintained in the department.

## **COMMUNICATION AND DISSEMINATION OF THE POLICY**

A copy of this policy shall be posted on the website of the Company.

## **AMENDMENTS**

The Board or the Management Committee may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

**Documents whose preservation shall be permanent in nature**

<b>S. No.</b>	<b>Nature of Document(s)</b>
01	Registration Certificates
02	Licenses & Statutory Approvals
03	Statutory Registers required under applicable laws
04	Audited financial statements
05	Minutes of General Meeting
06	Minutes of Board Meeting
07	Minutes of various Committee Meetings
08	Material Agreements/Contracts
09	Orders issued by Courts/Statutory bodies
10	Investment Documents/proofs including certificates etc.
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

## Annexure 2

### Documents with preservation period of eight years after completion of the relevant transactions

S. No.	Nature of Document(s)
01	Books of Accounts with supporting documents/papers in physical or electronic mode
02	Annual Return(s)/ Financial Statements with schedules
03	Annual/Half Yearly/Quarterly Filings (ITR, TDS Returns, ST/GST Returns etc. & any other statutory/regulatory documents) in physical or electronic mode
04	Personnel Documents
05	Insurance Policies/ Claims under various policies
06	Correspondences with the Regulators/Statutory Authorities
07	Non-Statutory Registers/Documents
08	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

**Annexure 3**

**Documents with preservation period of not less than ten years after the date of closure of the relevant Account/transactions**

<b>S. No.</b>	<b>Nature of Document(s)</b>
01	Clients KYC documents
02	Records of transaction & ledger book
03	Personnel information/Documents

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