



CASPIAN IMPACT INVESTMENTS PVT LTD

POLICY FOR PRESERVATION OF DOCUMENTS

Code:	Policy for Preservation of Documents
Version:	V-1.0
Date of version:	Feb 19, 2019
Date of last review	Feb 04, 2024 (Reviewed by Prema Jaiswal)
Policy Owner	Prema Jaiswal
Approved by:	Viswanatha Prasad
Confidentiality level:	Public (Level 1)

Levels of Confidentiality: Public (Level 1), Confidential (Level 2), Restricted (Level 3)

Please refer to annexure I for summary of previous version changes

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POLICY FOR PRESERVATION OF DOCUMENTS

Preface

The Board of Directors (the “Board”) of Caspian Impact Investments Private Limited (the “Company”) in its meeting held on 19th February, 2019, has approved and adopted the Policy for preservation of Documents /Records (“The Policy”) maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

Purpose of this Policy

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

Definitions

“**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, , maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

“**Electronic Form**” means on any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over or access to it.

“**Maintenance**” means keeping Documents, either physically or in Electronic Form.

Administration

The Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

Preservation of Documents

The Company shall preserve all its documents as per the requirements and provisions of the Company law and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to-time.

Documents which are to be maintained permanently:

- Certificate of Incorporation;
- The Original signed and stamped Memorandum of Association and Articles of Association;
- Certificate of Registration with RBI;
- Minutes of General Meetings, Board Meetings and various Committee Meetings;
- Register of Members along with Index;
- Foreign Register of Members, if any;
- Register of loans, guarantee, security and acquisition made by the Company (if applicable);
- Register of investments not held in its own name by the Company, if any;
- Register of contracts with related party and other companies in which director is interested;
- Register of Charges;
- Register of contracts with related party and contracts and bodies etc. in which directors are interested
- Register of renewed and duplicate share certificates
- Register of Directors and KMP
- Register of Shares/Other Securities Bought Back
- Register of Debenture holders along with Index

Documents which are to be maintained for at least eight financial years:

- Books of account together with the vouchers relevant to any entry in such books of account
- Copies of all Annual Returns
- Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
- Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be
- Employment /Personnel Record in case of employees of the Company
- Legal documents including but not limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters

Documents which are to be maintained for at least five years:

- Records of transactions between the Company and the Company's Borrower, for at least five years from the date of transaction or until the fulfilment of all obligations by the borrower, whichever is later.

- Identification of the Borrower and their addresses obtained while opening the account and during the course of business relationship, for at least five years after the business relationship is ended

Mode of Maintenance

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

Disposal and Destruction of Records

After the expiry of the statutory retention period, the preserved documents may be destroyed.

Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

- Recycle non-confidential paper records;
- Shred or otherwise render unreadable confidential paper records; or
- Delete or destroy electronically stored data.

Policy review

The Board may amend, review or modify this Policy in whole or in part, from time to time.

Annexure – I: Version Control Table

Version No.	Version Approval Date	Version Effective Date	Version Change Details	Version Owner	Version Approved By
1.0	19-Feb-2019	19-Feb-2019	First version	Vandana Bhatia, Company Secretary	Viswanatha Prasad, Managing Director