

EFC (I) LIMITED

Preservation of Documents & Archival policy

[Pursuant to Regulation 9 of securities Exchange Board of India (Listing Obligation and disclosure Requirements) 2015]

Sr. No.	Particulars
1.	Preamble
2.	Scope
3.	Objectives
4.	Definitions
5.	Interpretation
6.	Preservation principles
7.	Guidelines
8.	Modes of preservation
9.	Destruction of documents
10.	Review
11.	Disclaimer
12.	Annexure

1. PREAMBLE

The Board of Directors (the “Board”) of EFC (I) Limited (the “Company”) has adopted the following policy with regard to preservation and archival of Documents. **Regulation 9** of the Securities Exchange Board of India (“SEBI”) (Listing Obligation and Disclosure Requirements) Regulations, 2015 requires the Company to frame a policy on preservation of documents. Further, Regulation 30(8) requires the Company to frame a Policy on website disclosure and archival of such disclosures.

In compliance to the aforesaid regulation, this policy is formulated to define a process for preservation of documents and to further develop a guideline for archival of such documents including those which are maintained in the electronic form and are disclosed on the website of the Company. In other words, the Policy further encompasses the manner of archival of the documents which have been disclosed on the website of the Company for the timeframe prescribed in various Regulations

2. SCOPE

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

This policy sets the standard for classifying, managing and storing of records of the Company. The purpose of this policy is to establish a framework for effective record management and the process for subsequent archival of such records.

3. OBJECTIVES OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The major objectives of the policy are:

- Identification of statutory registers and other records of the Company which are required to be preserved.
- Identification and categorisation of the statutory registers and other records to be maintained either for eight years or permanently.
- Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- After completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

4. DEFINITIONS

1. “**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;
2. “**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

3. **“Archive/archiving”** is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit, and preserving the historical memory and proof of an activity.
4. **“Company”**, **“This Company”**, **“The Company”**, **“Company”** wherever occur in the policy shall mean **“EFC (I) Limited”**.
5. **“Current”** means running matter or whatever is at present in course of passage.
6. **“Board of Director”** or **“Board”**, means the collective body of the Directors of the company;
7. **“Policy”** or **“This Policy”** means, **“Policy on Preservation of Documents.”**
8. **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
9. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
10. **“Electronic Form”** means any contemporaneous 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 access to it.

5. INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. PRESERVATION PRINCIPLES

1. The EFC (I) Limited Company shall disclose on its website all such events and information which have been disclosed to the Stock Exchanges under **Regulation 30** of the Listing Regulations. Such disclosures shall be hosted on the website of the Company for a period of five years from the date of disclosure to the Stock Exchanges. For ensuring safety of the data hosted on the website of the Company, a back-up of the website shall be taken at least on a regular interval.
2. After five years, such disclosures shall be removed from the Company’s website and preserved in a secured server of the Company. Such disclosures shall be preserved in a logical manner viz. as per nature/date of the disclosure, etc. to facilitate easy retrieval as and when required. The disclosures shall be preserved in a non-editable format which do not require permanent preservation but require years of preservation as prescribed under Applicable Law on the server of the Company.
3. Physical preservations shall be ensured in proper store / record rooms, access to which shall be allowed to only persons authorised.

7. GUIDELINES

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for

preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

- a. documents whose preservation shall be permanent in nature;
- b. documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. documents that need to be preserved and retained permanently;
- b. documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulations;
- c. documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.
- d. where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

An indicative list of the Documents and the time-frame of their preservation is provided in “**Annexure- A**”

8. MODES OF PRESERVATION

The Documents may be preserved in

- a) Physical form; or
- b) Electronic Form.

The official of the Company required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

9. DESTRUCTION OF DOCUMENTS

The documents of the Company which are no longer required as per the time schedule prescribed in the “**Annexure A**” may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under “**Annexure A**”. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at “**Annexure B**”. The entries in the register shall be authenticated by the Authorised Person.

10. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

11. DISCLAIMER

In any circumstances, where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the newly enacted law, rule, regulation or standard will take precedence over this Policy until such time the Policy is changed to conform to the Law, rule, regulation or standard.

This Policy is lastly amended by the Board of Directors at its meeting held on May 29, 2024.

“ANNEXURE – A”

Indicative list

A) PERMANENT PRESERVATION:

- a. Common Seal
- b. Minutes books of Board, General Meetings and Committee Meetings
- c. Statutory Registers
- d. License and Permissions
- e. Statutory Forms and disclosures except for routine compliance
- f. Scrutinizers' Reports
- g. Register of Members
- h. Index of Members
- i. Agreements and Contracts entered

B) TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- f. All notices pertaining to disclosure of interest of directors
- g. Instrument creating a charge or modification
- h. Books of accounts, financial statements etc.
- i. Register of debenture holders or any other security holders

C) OTHERS:

As per applicable law

“ANNEXURE – B”

Specimen format of the register of documents disposed of / destroyed

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF LAW	DATE AND DESTRUCTION	MODE OF INITIALS OF THE AUTHORISED PERSON