



PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

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Document Owner	Secretarial
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Other applicable regulations / policies	<i>SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015</i>
Annexures / Supporting Documents	Refer Annexure Section

VERSION CONTROL:

Version no	Particulars	Approval & Effective date
1.0	New policy	13 th July 2023
1.0	Annual review	1 st November 2023
1.0	Annual review	4 th November 2024
1.0	Annual review	1 st November 2025

1. INTRODUCTION

Regulations 9 and 51(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) requires Hinduja Housing Finance Limited (HHF) to frame a policy for preservation of documents and archival of documents hosted on website.

Pursuant to the above-mentioned requirements, HHF has formulated this Policy for preservation of documents and archival of documents hosted in website. This Policy may be reviewed and amended by the Board of Directors from time to time

2. SCOPE AND PURPOSE OF POLICY

The policy aims to provide for preservation of its documents in accordance with the Loan Policy of the Company, provisions of the Companies Act, 2013, and in accordance with the Listing Regulations. The Archival policy will cover archival of all events or information which has been disclosed to the stock exchanges and hosted on the website of the Company in accordance with Listing Regulations and Applicable Laws.

3. DEFINITIONS

- 3.1. 'Applicable law'** means any law, rules, circulars, guidelines or standards under which the preservation of the Documents has been prescribed.
- 3.2. 'Archive'** means a place containing records, documents, or other materials of Company's historical importance are preserved.
- 3.3. 'Board of Directors' or 'Board'** shall mean the Board of Directors of Hinduja Housing Finance Limited, as constituted from time to time.
- 3.4. 'Company'** shall mean "Hinduja Housing Finance Limited".
- 3.5. 'Documents'** shall mean all Books and Paper and Books or Paper, Books of Accounts, records, files, electronic storage device, loan applications, Customer KYC documents, Loan Agreements and other loan related documents etc. and such other documents required to be maintained, under any law or regulation for the time being in force.
- 3.6. 'Electronic form'** includes storage of data, documents as per the practice adopted by the Company, as stipulated and devised by the Information Technology Department from time to time in various storage devices including Cloud, server etc.

4. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

- 4.1.** The documents of a permanent nature (listed in Annexure-1) shall be maintained and preserved permanently by the Company as per applicable laws and subject to statutory modifications, amendments, additions, deletions or any changes made therein from time to time

- 4.2. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure-2) shall be preserved by the Company for a term of not less than 8 years after completion of the relevant transactions subject to statutory modifications, amendments, additions, deletions or any changes made therein from time to time.

5. ROLES & RESPONSIBILITIES

- 5.1. The respective departments of the Company shall be responsible for maintenance and preservation of documents pertaining to their respective functions, areas of responsibilities and duties discharged by them.
- 5.2. Maintenance and preservation of documents should be such as to ensure that there is no tampering, alteration or destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents, other than the normal wear and tear in case of physical documents due to passage of time. However, necessary precautions and measures shall be adopted to avoid any damage with due reasonable care with appropriate processes

6. DESTRUCTION OF DOCUMENTS

After the expiry of the retention period, the preserved Documents may be destroyed with the approval of Managing Director in such manner as may be recommended by the HOD of the department concerned under his supervision. The details of Documents destroyed by the Company shall be recorded in the Register of Disposal of Records to be kept by department head(s) who are disposing of the documents in the format prescribed at **Annexure- 3**.

As regards the preservation and destruction of electronic documents, it shall be the responsibility of the Information Technology Department to comply with the policy requirements including the statutory requirements, as may be relevant and applicable.

7. ARCHIVAL POLICY

- 7.1. The disclosures made by HHF as per Listing Regulations shall be hosted on the website of the Company for a minimum period of five years.
- 7.2. The contents with respect to the events or information as disclosed under the Listing Regulations would be moved to an archived folder, provisioned in the website of the Company, after a period of five years from the date on which such announcements / disclosures were made.
- 7.3. The archived Documents will be available in the archived folder for a period of 2 years or such other period as may be decided by the Managing Director from time to time, post which they shall be removed from the website of the Company.
- 7.4. The contents of the archived folder on the website of the Company will not be accessible to the public.

8. COMMUNICATION AND DISSEMINATION OF THE POLICY

A copy of this policy shall be hosted on the web-site of the Company.

9. DISCLAIMER

Nothing contained in this Policy shall operate in derogation of any law for the time being in force or of any other regulation in force. In any circumstance where the terms of this Policy differ from any Applicable Law governing the Company, such Applicable Law will take precedence over this Policy and procedures until such time as this Policy is modified in conformity with the Applicable Law.

ANNEXURE-1

Indicative List - Documents whose preservation shall be permanent in nature

S.No.	Nature of Document(s)
1	Certificate of Incorporation, Memorandum/Articles of Association and any Certificates, Licenses and Permissions
2	Statutory Registers required under applicable law
3	Minutes of General Meeting
4	Minutes of Board Meeting
	Minutes of various Committee Meetings
6	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time by Company and RTA

ANNEXURE-2

Indicative List - Documents with preservation period of not less than 8 years after completion of the relevant transaction/from date of closure of loan:

S.No.	Nature of Document(s)
1	Books of Accounts
2	Annual Return(s) and copies of all certificates and documents required to be annexed thereto
3	Attendance Registers of Board and Board Committees
4	Register of Debenture-holders including Index of Debenture-holders (from the date of redemption of debentures)
5	Office copies of Notice of General Meeting, scrutiniser's report, if any and related documents
6	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers
7	Instrument creating a charge or modification
8	Loan Applications, Customer KYC documents, Loan Agreements and other loan related documents
9	Any other document as may be required to be maintained in terms of the Act, Directions, Guidelines and Regulations maintained and preserved from time to time



ANNEXURE-3

Specimen format of the register of Documents disposed of / destroyed:

PARTICULARS OF DOCUMENT	DATE OF DESTRUCTION	DATE OF APPROVAL	INITIALS OF THE AUTHORISED PERSON