PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

REVISION HISTORY

S. No.	Date	Revision details
1.	November 08, 2022	The Board of Directors of the Company has formulated this Policy and approved the same at its meeting held on November 02, 2022.
2.	January 09, 2025	The policy has been amended in line with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.
3.	October 29, 2026	The policy has been amended in line with the latest SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025.

PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

1. **Legal Framework:**

The Preservation of Documents and Archival Policy has been formulated in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended and the Companies Act, 2013, and amendments thereafter, which requires every listed entity to formulate and make available on its website, the Preservation of Documents and Archival policy.

2. **Definitions:**

"Policy" means this Preservation of Documents and Archival Policy.

"SEBI Listing Regulations" means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto.

"Company" means Veritas Finance Limited (formerly known as Veritas Finance Private Limited).

"Board of Directors" shall mean the Board of Directors of the Company, as constituted from time to time.

"Electronic mode" include any electronic device such as computer, laptop, tab, compact disc, cloud space, server or any other form of storage or 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.

"Documents" shall mean statutory registers, returns, forms etc. required to be maintained and preserved by the Company in physical or electronic form under the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996, and the provisions of the Companies Act, 1956 and Companies Act, 2013 and such other records under various laws applicable to the Company.

3. **Preservation of documents:**

The documents and records shall be preserved as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the SEBI Listing Regulations, the RBI directions, and any other law, rules, regulations as may be applicable to the Company from time-to-time.

Where the documents / records of the Company are maintained by any external agency like the Registrar and Share Transfer agents, such an agency shall ensure the adoption of this policy for the preservation of the documents of the Company.

Documents which are to be maintained permanently:

The Company shall maintain the following documents on a permanent basis:

- Registration certificate from the Reserve Bank of India
- Certificate of Incorporation
- The Memorandum of Association and the Articles of Association of the Company

- Attendance registers, notices, agenda, notes on agenda and other related papers, and 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, if any, made by the company
- Register of investments not held in its own name by the company, if any
- Register of contracts with related party and contracts and Bodies etc. in which directors are interested
- Register of charges
- Registers of Renewed and duplicate share certificates
- Register of directors and KMP
- Register of debenture holders (including foreign register of debentures), if any or register for any other securities issued by the Company
- Annual audit Reports and financial statements
- Material agreements/contracts
- Order issued by courts/statutory bodies
- License and Permissions granted by various authorities
- Original Documents relating to Sale/ Purchase of any property in the name of the Company
- Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

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 reports and annual returns
- Disclosure of Interest received from the directors of the Company in the manner prescribed
- Instrument creating a charge or modifying a charge, if any
- Register of deposits accepted or renewed, if any
- Correspondence with department/shareholders
- Non-Statutory registers/documents
- Certificates surrendered to a Company
- Press releases and publicly filed documents along with all documents filed with the stock exchanges
- Correspondences with departments/shareholders
- Employment records/personnel documents that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment, such as actions taken against the personnel.
- Relevant marketing and sales documents
- Legal documents and intellectual property records relating to the development and protection of the intellectual property rights
- Insurance policies of the Company
- Original lease agreements (provided there is no dispute / claim /litigation is pending. If any such dispute persists, it should be preserved till the dispute is settled / closed)
- Investment records (with respect to investments made in the normal course of business)

- Structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings

Documents which are to be maintained for at least five years under the Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025:

- preserve the records pertaining to the identification of the customers and their addresses, obtained while opening the account and during the course of business relationship, for at least five years after the business relationship has ended

- maintain all necessary records of transactions between the NBFC and the customer, both domestic and international, for at least five years from the date of transaction;

- The NBFC shall ensure that in case of customers who are non-profit organisations, the NBFC registers details of such customers on the DARPAN Portal of NITI Aayog. If they are not registered, the NBFC shall register the details on the DARPAN Portal. The NBFC shall also maintain such registration records for a period of five years after the business relationship between the customer and the NBFC has ended or the account has been closed, whichever is later.

Website Disclosures and Archival:

The event / information disclosed to the stock exchanges including audio or video recordings, if and when applicable, disclosure of information having a bearing on the performance of the Company, price sensitive information, and such other information as required under Regulation 30 of the SEBI Listing Regulations and /or other applicable law shall be placed on the website of the Company under the section entitled "Investor Relations" for a minimum period of five years or such other period as prescribed by the Regulations and/or applicable law.

After completion of the minimum period of five years or such other period as prescribed by the Regulations and/or applicable law, the events or information shall be archived by the Company for a further period of two years.

4. Destruction of documents:

Documents or records that are no longer required, or have satisfied their required periods of retention, shall be reviewed by the respective departments and accordingly, if required, appropriate actions shall be taken to destroy those documents or records unless there are any litigations/ assessments pending and may be considered necessary for preservation for a longer period. The need for destruction of the documents so preserved shall require the approval of the Managing Director and Chief Executive Officer. 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 below prescribed format:

Particulars of Documents	**Date of Destruction**	**Date of approval**	**Initials of the authorised person**

5. Forms and Formats

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

6. 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.

The officer(s) of the Company who is / are generally expected to observe the compliance of requirements of Applicable Laws shall be the person(s) responsible to preserve the Documents (authorised person).

7. Review / Amendments to Policy:

The Policy would be reviewed on an annual basis by the Board of Directors. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors.

However, the amended regulatory requirements will supersede the existing Policy till the time Policy is suitably amended.

8. Communication and Disclosure:

Adoption of this policy shall be communicated to the stock exchange(s) where the Company's equity shares are listed. This policy shall also be disclosed on the website of the Company i.e. https://www.veritasfin.in/.