

Policy for Preservation of Documents

1. Preamble:

The Securities and Exchange Board of India (SEBI) has issued and notified "SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Regulations") on 2nd September 2015.

The Regulations requires the Board of Directors of a company to frame a Policy for Preservation of Documents classifying them in to two categories:

- i. Documents whose preservation shall be permanent; and
- ii. Documents to be preserved for not less than eight years.

The Documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that documents whether in physical or electronic mode, forms an important and integral part of the Company's records. The preservation of Documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Accordingly, the Board of Directors of Pro Fin Capital Services Limited (the "Company") has adopted this Policy for preservation of documents.

2. Applicability:

This Policy is applicable to all Documents maintained in physical and electronic mode by the Company.

The Documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

3. Preservation of Documents:

Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Agreement and the Regulations and any other law, rules, regulations as may be applicable to the Company from time to time.

4. Documents to be preserved permanently:

- Memorandum of Association and the Articles of Association of the Company.
- 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.
- 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.

5. Following documents shall be preserved and maintained for a period of 8 years from the date of its event, unless specified under any other any Act or rules, for a longer duration:

- Books of account together with the vouchers relevant to any entry in such books of account.
- Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company.
- Copies of all Annual Returns.
- Disclosure of Interest received from the Directors of the Company in the manner prescribed.
- Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings.
- Instrument creating a Charge or modifying a Charge, if any.
- Changes to the Memorandum of Association and the Articles of Association, if any.
- Register of deposits accepted or renewed, if any.

The documents maintained for eight financial years may be destroyed after the expiration of eight financial years. Documents pertaining to legal cases, litigations, tax disputes and pending assessments etc. shall be preserved beyond the period of 8 years for as long as may be required.

6. OTHER REQUIREMENTS

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.

Mode of Maintenance

It may be noted that Pro Fin Capital Services Limited 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.

7. DISPOSAL AND DESTRUCTION OF RECORDS

The records maintained under this Policy can be destroyed in one of the following ways:

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

8. MODIFICATION OF THE POLICY

In case of any subsequent amendments to the Regulations which makes any of the provisions in the Policy inconsistent, the provisions of the Regulations shall prevail. The policy may be updated/amended from time to time by persons authorised by the Board in this regard.
