

MANAPPURAM FINANCE LIMITED (MAFIL)
Policy on preservation of documents and Archival of
documents in the website

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Prepared By : **Secretarial department**
Reviewed by : **MAFIL Policy Review Committee**
Approved by : **Board of Directors**



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POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS IN THE COMPANY WEBSITE

*(As approved by the Board on November 5, 2015,
Last reviewed on 04^{10th} Aug 2023)*

1. Purpose and Scope:

The purpose of this documents to present a policy statement for Manappuram Finance Limited (“MAFIL”) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”) and any other applicable regulatory provisions.

The policy is intended to define MAFIL’s preservation of documents, responsibilities of departments in respect of such preservation and to provide guidance to the executives and staffs working in MAFIL in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frames the guidelines for fundamental accountability of MAFIL to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. Appendix to the policy provides the types of records to be preserved, departments who are responsible for the same, on how long certain documents should be retained, and when those documents should be disposed of, if no longer needed and the appendix to this policy is inclusive but not exhaustive.

This policy has been adopted and approved by the Board of Directors at its meeting held on 5 November, 2015.

2. Statutory Mandate:

The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources.



3. Classification of Documents to be preserved / retained:

Based on the recommendation of the management of the Company, the Board of Directors have classified the following documents to be retained and preserved for posterity.

- ⊥ *Documents that need to be preserved / retained permanently – Doc 1*
- ⊥ *Documents that may be preserved / retained for a period of 8 years – Doc 2*
- ⊥ *Documents to be preserved electronically and archived when necessary – Doc 3*
- ⊥ *Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case – Doc 4.*
- ⊥ *Emails of all employees in the grade AGM and above for a period of 3 years – Doc 5.*
- ⊥ *Documents like budget papers etc., which may be retained for less than 8 years – Doc 6.*

4. Disclosures on website and Archival policy:

Company shall ensure that all events or information that has been disclosed to the stock exchange(s) under regulation 30 of Listing Regulations shall be hosted on the company's website for a period of 5 years and thereafter archived for three years.

5. Responsibility of Employees for Preservation of Documents:

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impact on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area of work. Such policy bestowing responsibility on the Company's employees would immensely help company's response to any notice or query or inspection or audit from any regulator or statutory authority or as a litigation preparedness tool helping the Company's and Outside legal counsel to track down documents to handle the notices, query, clarification, audit, inspection from any quarter or to fight and represent in legal cases.

6. Periodical Review of the Policy by Top Management:

The Policy should be complied with by all levels of employees. The policy should be reviewed periodically by the Top Management and proposed amendments in the policy shall be placed before the Board. The Top management shall also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

Top Management under this policy means Key Managerial Personnel, Executive Vice Presidents, Chief General Managers, Senior General Managers, and Senior Vice President

7. Administration:

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is as given in the annexure.

8. Suspension of Record Disposal in the event of Litigation or Claims:

If the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning MAFIL or commencement of any litigation against the Company, such employee shall inform the Top Management of suspension of further disposal or destruction of documents until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top

Management in such an eventuality shall inform all the connected employees by mail under "Userlist" of the need to retain the documents and suspension of disposal or destruction of the same.

9. This policy was approved by the Board of Directors at its meeting held on 5th November, 2015.

APPENDIX

1. Accounting and Finance records including Annual Financial statement

Record Type	Retention Period	Document Type
Accounts Payable ledgers and schedules	8 Years	Doc -2
Accounts Receivable ledgers and schedules	8 Years	Doc – 2
Annual Audit Reports and Financial Statements	Permanent	Doc – 1
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit	Doc – 2
Annual Plans and Budgets	3 years after the budget year is closed	Doc – 6
Bank Statement and Cancelled Cheques	8 years	Doc – 2
Employee Expense Reports	8 years	Doc – 2
General Ledger	Permanent	Doc – 1
Interim Financial Statements	8 years	Doc – 2
Notes Receivable ledgers and schedules	8 years	Doc – 2
Investment Records	Permanent	Doc – 1
Security deposit receipt copies: - (a) for settled amounts (b) for Others	8 years after termination of the contract Permanent	Doc – 6

2. Insurance Records

Record Type	Retention Period	Document Type
Annual Loss Summaries	8 Years	Doc -2
Audits and Adjustments	8 Years	Doc – 2
Claim Files (Including correspondence, medical records, injury documentation, etc.	Permanent	Doc – 1
Group Insurance Plans – Active Employees	8 years	Doc – 2
Group Insurance Plans - Retirees	Permanent	Doc – 1
Insurance Policies for the Company	Permanent	Doc – 1
Journal Entry Support Data	8 years	Doc – 2
Releases and Settlements	Permanent	Doc - 1

3. Tax records

Record Type	Retention Period	Document Type
Tax-Exemption Documents and related correspondence: - (a) of our Company (b) of others submitted to the Company	Permanent(a) 8 Years (b)	Doc -1
Payroll Tax records	8 years	Doc – 2
Tax Bills, Receipts, Statements		Doc – 2
Tax Returns – Income, Franchise, Property	Permanent	Doc – 1
Tax work paper packages - Originals	8 years	Doc – 2
Annual Information Returns – State and Central	Permanent	Doc – 1
Service Tax / GST Records	8 years	Doc – 2
All Orders from the Tax Department: - (a) If not disputed further (b) If disputed	8 Years from the date of order (a) Further 8 years from the date of the final judgement / decision.(b)	Doc - 2

Responsibility for 1 to 3: FINANCE AND ACCOUNTS DEPARTMENT

4. Contracts entered into by the Company including Marketing Records



Record Type	Retention Period	Document Type
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents)	8 years after expiry of the contract	Doc – 2

Responsibility: LEGAL AND MARKETING DEPARTMENT

5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.

Record Type	Retention Period	Document Type
Corporate Records (certificate of incorporation, commencement of business, name change certificate, Certificate of registration from RBI and other business related registrations, permissions, licenses, listing agreement, , MOA, AOA, annual reports originals, etc.	Permanent	Doc – 1
Share Transfer Forms, Share Certificates, Attendance Registers of Board, Nomination, Stakeholders Relationship, Audit, Risk Management and CSR committees, and other statutory approvals	Permanent	Doc – 1
ROC Filings and Stock Exchange filings in physical and Electronic form	8 years from the date of filing	Doc – 6
Board File (An update on Compliance	5 years	Doc- 6



related matters presented in the Board Meeting		
Minutes of the Board Meetings, its committees, share holders, creditors	Permanent	Doc-1
Statutory Registers and records	Permanent	Doc-1
Structural Database maintained electronically containing details of Insiders, information shared by insiders and information shared with insiders	8 years	Doc-2

Responsibility: SECRETARIAL DEPARTMENT

- 6. RBI Related Records including Board approved policies, all communications with RBI, ASCI, FIU, etc., Board presentations, QCC, Half yearly Compliance Certification from FZMs, etc.**

Disclosures of trading by insiders and immediate relatives	5 years	Doc-6
Record Type	Retention Period	Document Type



Quarterly Compliance Certificates (QCC) obtained from various departments ensuring compliance	5 years	Doc- 6
Half yearly Compliance Certification from FZMs (Certification obtained from Field Zonal Managers who are consolidating Compliance certificate from all Branch under their zone)	5 years	Doc- 6
RBI Correspondence File	5 years	Doc- 6
RBI Complaint File (All complaints received through RBI)	5 years	Doc- 6
FIU Correspondence File	5 years	Doc- 6
Advertising Standards Council of India- ASCI (Communications with ASCI)	3 years	Doc- 6
Other Letters (Letters directly forwarded to Customers for complaints received through RBI)	5 years	Doc- 6
RBI Compliance Audit Verification (verification of adherence to RBI instructions/rules/circulars)	5 years	Doc- 6
Transaction Monitoring (PAN and KYC verification of High value customers)	5 years	
Board Approved Policies	Permanent	Doc -1
Joint Custodian report collected from various departments	5 Years	Doc – 6



Other Internal documents	5 Years	Doc - 6
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Responsibility: COMPLIANCE DEPARTMENT**7. Legal Files and Records**

Record Type	Retention Period	Document Type
Legal Memoranda and Opinions	8 years after the closure of the matter	Doc – 4
Litigation files	3 year after expiration of disposal of the case	Doc – 4
Court Orders	Permanent	Doc – 1

Responsibility: LEGAL DEPARTMENT**8. Property Records**

Record Type	Retention Period	Document Type
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent	Doc – 1
Original Purchase / Sale Deeds	Permanent	Doc – 1
Original Lease Agreements	3 years after expiration of the lease	Doc – 6

Responsibility: LEGAL DEPARTMENT**9. Payroll Records**

Record Type	Retention Period	Document Type
Employee Deduction Authorization	3 years after termination of service of employment	Doc – 6
Payroll Deductions	3 years after termination of service of employment	Doc – 6
Labour Distribution Cost Records including details regarding gratuity and retiral disbursements	3 years after termination of service of employment	Doc – 6
Payroll Registers (Gross and Net)	3 years after termination of service of employment	Doc – 6 -
Time Cards / Sheets	2 years	Doc – 6



Unclaimed Wage Records	3 years	Doc – 6
Leave Records	2 years after the relevant period	Doc - 6

Responsibility: HUMAN RESOURCES DEPARTMENT

10. Pension and retirement related Records

Record Type	Retention Period	Document Type
Retirement and Pension Records	Permanent	Doc – 1

Responsibility: HUMAN RESOURCES DEPARTMENT

11. Personnel and HR Records

Record Type	Retention Period	Document Type
Personnel Files of individual employees	Permanent	Doc – 1
Commission / Bonuses / Incentives / Awards	8 years	Doc – 2
Employee Earnings Records	3 years after termination of service of employment	Doc – 6
Employee Handbook & Induction Manual	Permanent	Doc – 1
Employee Medical Records	3 years after termination of service of employment	Doc – 6
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers	3 years after termination of service of employment	Doc – 6
Employment Contracts - Individual	3 years after termination of service of employment	Doc – 6
Correspondence with Employment Agencies and Advertisements for job openings	3 years	Doc – 6
Job Description	3 years after superseding the earlier document	Doc – 6

Responsibility: HUMAN RESOURCES DEPARTMENT



12. Programs & Service Records

Record Type	Retention Period	Document Type
Attendance Records	3 years	Doc – 6.
Program statistics, etc.	3 years	Doc – 6
Research & Publications	Permanent	Doc – 1

Responsibility: HUMAN RESOURCES DEPARTMENT

12. Sponsorship Projects Records

Record Type	Retention Period	Document Type
Sponsorship agreements	Permanent	Doc – 1

Responsibility: HUMAN RESOURCES DEPARTMENT

13. Corporate Social Responsibility Records

Record Type	Retention Period	Document Type
Records on CSR Projects(including amount budgeted, spent and balance if any) projects undertaken and progress thereon	8 years	Doc – 1

Responsibility: ADMINISTRATION DEPARTMENT

14. Correspondence and Internal Memoranda

General Principle: Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract

1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years.
2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.
3. Electronic Documents including PDF files.
 - PDF documents – Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end.
 - Text/Formatted files: All word/excel/Power point files may be deleted once every year depending on the Importance or lack of it.

Responsibility: RESPECTIVE DEPARTMENT



15. Electronic Documents including email retention and back up

1. Electronic Mail: Not all email needs to be retained, depending on the subject matters
 - All e-mail – from internal and external sources to be deleted after 24 months.
 - Staff will strive to keep all but an insignificant minority of their email related to business issues.
 - Central I.T team would archive email for six months after the staff has deleted it after which time the email will be permanently deleted.
 - Staff will not store or transfer the Company related emails on non-work related

computers except as necessary or appropriate with due approvals from the Central IT team and the respective Managers.

- Staff will take care not to send confidential / proprietary information to outside sources.
- Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employees' workplace.

Document Type: Doc – 3

2. Web page files

- May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
- May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page.

Document Type: Doc – 3

3. Other electronic and digital records including logs from application and infrastructure devices.

- May be retained for a period of 90 days as specified in SEBI regulations
- May be archived by the I.T. department with the support of the service provider for a period of 2 years after the initial period of 90 days in live devices.

: Document Type: Doc – 3

Responsibility: INFORMATION TECHNOLOGY DEPARTMENT

16. Miscellaneous Records

Record Type	Retention Period	Document Type
Consultant Reports	8 years	Doc – 6
Policy and procedures manuals – Original	Current version with revision history	Doc – 6
Policies and procedures manuals - Copies	Retain current version only	Doc – 6
Dealership agreements	Current version with revision history	Doc - 6
Annual Reports	Permanent	Doc -1

Responsibility: HUMAN RESOURCES, LEGAL AND SECRETARIAL DEPARTMENTS

We are revising the current storage period of a total of 10 years for all documents to three categories - 5 years & 10 years & permanently kept in the branch, depending on the importance and future requirement for producing the same before Regulator or any law enforcement agencies.

- 5 years - The documents which are proposed for a maximum period of 5 years (will be kept in the branch itself) after the period the same shall be shredded by the branches on their own after the verification of Auditor/Vigilance.
- 10 years - The documents which are proposed for a maximum period of 10 years (5 years in the branch and another 5 years in storage agencies) after the period shall be shredded by the storage location after the verification of Auditor/Vigilance.

The revised timeline for each type of document is enlisted below:

S L	Documents	Timeline Year	Branch	Storage location
1	Pawn ticket (Office & Customer Copy)	10	5	5
2	Scheme Chart	10	5	5
3	Undertakings	10	5	5
4	Due Diligence	10	5	5
5	Pledge Gold Slip	10	5	5
6	Terms And Condition	10	5	5
7	Release Slip (Transaction Advice & Customer Copy)	10	5	5
8	Inventory Slip	10	5	5
9	Interest Payment Slip	10	5	5
10	Authorization Letter	10	5	5
11	Form K	10	5	5

12	OGL Customer Mobile Number Or Account Number Changing Form	10	5	5
13	Day Book (DPN pawn tickets and all the settlement documents)	10	5	5
14	Deceased Customer-Related Documents	5	5	Na
15	OGL Register	5	5	Na
16	OGL consent form	5	5	Na
17	Aadhar Consent Form	Permanently kept in branch		
18	Form 60 Or PAN Card	Permanently kept in branch		
19	Customer KYC	Permanently kept in branch		

SL	Registers	Years	Branch	Storage location
1	Cash Stock Register	5	5	Na
2	Cash Movement Register	5	5	Na
3	Cash Transit Register	5	5	Na
4	Cheque Register	5	5	Na
5	Security Attendance Register	5	5	Na
6	Movement Register	5	5	Na
7	Customer Complaint Register	5	5	Na
8	Recovery follow-up Register	5	5	Na
9	Customer Reference Register	5	5	Na
10	Employee Reference Register	5	5	Na
11	GPS Register	5	5	Na
12	Inspection Register	5	5	Na
13	Key Register	5	5	Na
14	Lost Customer Register	5	5	Na
15	Position Register	5	5	Na
16	Shop Visit Register	5	5	Na
17	Sticker Register	5	5	Na
18	Personal Visit Register	5	5	Na
19	Recently Released Customer Calling Register	5	5	Na
20	LMS Register	5	5	Na
21	Auction Customer follow-up Register	5	5	Na
22	Release Register	5	5	Na
23	Agreement Register	5	5	Na
24	Morning meeting Register	5	5	Na
25	Bucket Wise Follow-up s Register	5	5	Na
26	NPA restructuring Register	5	5	Na

27	Normal call Register	5	5	Na
28	Visitor Register	5	5	Na
29	Customer Visit Register	5	5	Na
30	Bucket-wise interest Collection Register	5	5	Na
31	Repledge Call Register	5	5	Na
32	Fixed Asset Register	5	5	Na
33	Hardware Complaint Register	5	5	Na
34	NPA Customer Register	5	5	Na
35	Auction Surplus/loss Register	5	5	Na
36	Form k & Authorization Register	10	5	5
37	Safe and Strong room Movement Register	10	5	5
38	Auction Register	10	5	5
39	Auction Participation Register	10	5	5
40	Gold Transfer Register	10	5	5
41	Pawn Ticket & DPN Register	10	5	5
42	Form K s Register	10	5	5
43	Authorisation s Register	10	5	5
44	Musterole Register	10	5	5
45	Attendance Register	10	5	5
46	Service record Register	10	5	5
47	Wage Register	10	5	5
48	Maternity Register	10	5	5
49	Forex- FLM 1 & FLM 2 daily summary and Balance Book	10	5	5
50	Forex- FLM 3 Register of Purchase of Foreign currencies from the public	10	5	5
51	Forex- FLM 4 Register of purchase of foreign currencies/coins	10	5	5
52	Forex- FLM 5 Register of foreign currencies to the public	10	5	5
53	KYC (Money transfer & gold loan) Register	Permanently kept in branch		
54	Bidder KYC Register	Permanently kept in branch		
55	Gold KYC Register	Permanently kept in branch		
56	Fire Extinguisher Register	Permanently kept in branch		

SL	Files	Years	Branch	Storage location
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1	Bill file(marketing & other bill)	5	5	Na
2	Marketing Bill file	5	5	Na
3	RM taxi bill file	5	5	Na
4	Interbank Cash Transfer Register file	5	5	Na
5	Money Transfer file	10	5	5
6	BRS file	10	5	5
7	Money Transfer-Western Union	10	5	5
8	Money Transfer-Transfast	10	5	5
9	Money Transfer-Ria	10	5	5
10	Money Transfer-Money Gram	10	5	5
11	Money Transfer-Instant Cash	10	5	5
12	Money Transfer-Fast N Cash	10	5	5
13	Money Transfer-Royal Money	10	5	5
14	Money Transfer-EZ unit	10	5	5
15	Forex Rate	10	5	5
16	Forex FLM 1& FLM 2	10	5	5
17	Forex purchase-FLM 3	10	5	5
18	Forex Purchases foreign currency Authorized dealers FLM 4	10	5	5
19	Forex -FLM 5 LERMS	10	5	5
20	Forex -FLM 6	10	5	5
21	Forex sale	10	5	5
22	Digital Personal loan file	10	5	5
23	Inventory Report file	10	5	5
24	Money Transfer Audit file	10	5	5
25	Mtfr Form	10	5	5
26	Inward Receipt	10	5	5
27	Auditing file	Permanently kept in branch		
28	Labour Registration file	Permanently kept in branch		
29	Weighing Balance Renewal file	Permanently kept in branch		
30	Professional Tax file	Permanently kept in branch		
31	Circular file	Permanently kept in branch		
32	KYC Gold Loan file	Permanently kept in branch		
33	KYC Money Transfer file	Permanently kept in branch		
34	KYC forex file	Permanently kept in branch		
35	Aadhar Consent Form	Permanently kept in branch		

36	Customer Photo	Permanently kept in branch		
37	Money Transfer KYC Registers	Permanently kept in branch		
38	Building tax file	Permanently kept in branch		
39	Rent agreement file	Permanently kept in branch		
40	Letter/correspondences from Regulatory Authorities	Permanently kept in branch		

The mandatory documents (KYC and other important documents) are kept in the branch itself no periods are applicable.

Responsibility: GOLD LOAN OPERATION DEPARTMENT
