

ACHIEVERS FINANCE INDIA LMTD

(formerly known as Achiivers Finance India (P) Ltd)

POLICY FOR PRESERVATION OF DOCUMENTS

1. Preamble:

In pursuance to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**"), the Board of Directors of Achiivers Finance India LmtD (the "**Company**") (formerly known as Achiivers Finance India (P) Ltd) approved the Policy for Preservation of Documents ("**Policy**") in its Board Meeting dated 03 June, 2019 and this Policy shall come into effect immediately from the date of the Board Meeting.

The Regulation requires the Board of Directors of a Listed Company to frame a Policy for Preservation of Documents classifying them in to 2 (two) categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for a minimum period of 8 (eight) years.

Provided that the Company may keep documents specified in clauses (i) and (ii) above in electronic mode.

The Company recognizes 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.

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. Documents:

For the purpose of this Policy the term "*Documents*" shall mean statutory records, registers, returns, forms etc. required to be maintained and preserved by the Company in physical or electronic form under the Companies Act, 1956 / Companies Act, 2013, Securities and Exchange Board of India Act, 1992, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any other laws as

applicable from time to time.

4. Documents to be preserved permanently:

A) Companies Act, 2013:

- a. Certificate of Incorporation.
- b. Memorandum and Articles of Association as amended from time to time.
- c. Register of Contracts, Register of Charges, Register of Investments.
- d. Register of Directors and KMPs and the securities held by them.
- e. Register of Loans and Investments made by the Company.
- f. Register and Index of Members including Foreign Register and Record of Beneficial Owner.
- g. Register of Allotment, Register of Transfer and Transmission of shares or Debentures and other securities, Register of Renewed and Duplicate Share Certificates.
- h. Minutes of the Board, Committees of the Board, as and when applicable and General Body meetings including meeting conducted through Postal Ballots.
- i. Resolutions passed by Circulation.
- j. Various Forms and returns filed with the Authorities.
- k. Audited Financial Statements.

B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- a. Listing Agreement executed with the Exchanges.
- b. Trading approval relating to listing of securities.
- c. Offer documents for Public Issues and Private placement of securities filed with the Securities and Exchange Board of India.

C) Others:

- a. Intellectual Property Rights Documents.
- b. Register of Records and Documents destroyed.
- c. Any other records as required under any law, from time to time.

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

A) Companies Act, 1956 / Companies Act, 2013:

- a. Register of Buy-back of Securities from the date of completion of buy-back.
- b. Attendance Registers, Notices and Notes to agenda of the Board, Committees of the Board, as and when applicable, General Meetings and Postal Ballots.
- c. Register of Proxies.
- d. Notice of Interest by Directors and Key Managerial Personnel.

- e. Instruments creating or modification of Charges from the date of satisfaction of respective charge.
- f. Register of Debenture holders or other security holders and Debenture Trust Deed from the date of its redemption.
- g. Books of Accounts including vouchers and bills.
- h. Annual Returns together with the Annexures.
- i. All Share Certificates surrendered to the Company.
- j. Register of Deposits.
- k. Scrutinizer's Report on Postal Ballot and AGM.
- l. Documents relating to appointment of Managerial Personnel.
- m. Dividend reconciliation statement.
- n. Certified copy of the order of any court or Tribunal confirming reconstruction and amalgamation of companies, Schemes, Arrangements or contract involving transfer of shares, reduction of share capital and certified copy of the order and minute, cancellation or variation of shareholders' right, compromises and arrangements with creditors and members and copy of orders in appeal.

B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- a. All reports filed with the stock exchanges from time to time.
- b. All disclosure of various events and Press Releases.
- c. Intimations of Board Meetings.

C) Documents filed with Stock Exchanges under SEBI Regulations:

All disclosures and intimations filed under:

- a. SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.
- b. SEBI (Prohibition of Insider Trading) Regulations, 2015.
- c. Prevention of Money Laundering Act, 2002 and its Rules.
- d. All disclosures and intimations filed under SEBI (Share Based Employee Benefit) Regulation, 2014 and SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines 1999.

D) Other:

- a. Such other records as may be required under any law from time to time.

6. Review of Policy

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

sd/-
Mr. Suman Chakraborty
Director