
Policy on Preservation of Documents



Version No.	Approving Authority	Date of Approval
1.	192 nd BOD	30 th August 2024
2.	75 th BOD	8 th February 2016

**PTC INDIA FINANCIAL SERVICES LIMITED
NEW DELHI**

POLICY ON PRESERVATION OF DOCUMENTS

PURPOSE OF POLICY

Regulation 9 of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015 [herein after referred to as “SEBI (LODR) Regulations” or “Regulations”, requires every listed company to have a policy on preservation of documents/ records either in Physical Mode or Electronic Mode.

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy.

This Policy categorizes the records that whose preservation shall be permanent in nature and documents that will be preserved for specified period of time and outlines responsibilities to create, maintain and lawfully dispose of the records. It endorses the preservation of records in the Company’s Archives.

DEFINITIONS

- I. **“Company”** means PTC India Financial Services Limited
- II. **“Board of Directors” or “Board”** in relation to a company, means the collective body of the directors of the company.
- III. **“Documents”** means as defined in sub- section 36 of section 2 of the Companies Act, 2013
- IV. **“Electronic Records”** means as defined in Sec 2(1)(t) of Information Technology Act, 2000 or as amended from time to time
- V. **“Electronic Form”** means as defined in Sec 2(1)(r) of Information Technology Act, 2000 or as amended from time to time
- VI. **“Listing Regulations”** means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015

VII. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed

VIII. **“Policy”** means this Policy of Preservation of Documents of the Company;

IX. **“Records”** in relation to this policy includes accounting records, books or papers and books and papers as defined in sub-section 12 of section 2, books of accounts as defined in sub-section 13 of section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

OBJECTIVE OF POLICY

This Policy mechanism provides the comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- c) Systematic disposal/destruction of Company’s non-current records that have outlived their administrative usefulness.
- d) Identification of the Company’s records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company’s Archives.

VALUE OF RECORDS

The Company understands the value of its records. Thus attached to this Policy are the combinations of qualities that relate to their importance, usefulness or quality. The following values are offered by the records:

- informational value – all information presented, whether written, pictorial or audio

- material value – intrinsic information about the records that can be retrieved from the material itself, such as age, provenance, history, software
- cultural value – encompasses a range of values such as political, religious, historical, ethical, aesthetic, and many other similar values.

As per this Policy, the Company shall preserve the qualities of all records as far as possible.

SCOPE OF THE POLICY

For the purpose of achieving the above objectives, the documents covered as per this Policy have been divided into two sections, i.e. the records or the documents that will be preserved permanently by the Company and the records or the documents that will be preserved for the period of at least 8 years (or any higher period prescribed under respective applicable law) and not permanently. This Policy applies to the records maintained by the Company in any format or medium. The records which are not required to be retained permanently shall be disposed off according to this Policy.

AUTHORITY AND RESPONSIBILITY

The The Head of each department shall designate an employee in the department to be in-charge of the records (herein after Custodian) who shall ensure compliance with this policy.

All staff and management of the Company shall assist in implementing this Preservation Policy as appropriate to their roles and responsibilities.

Where the custodian tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy to the other authorized custodian.

CLASSIFICATION OF RECORDS

Based on the requirement and for the purpose of effective management, the period for which the records of the Company shall be maintained have been classified into two categories:

- I. Documents whose preservation shall be permanent in nature;
- II. Documents whose preservation shall be at least 8 years.

The classification of the documents has been made in the Annexure which forms part of this Policy.

While prescribing different time period for preservation of records, the following aspects have been taken into account:

- (a) Compliance with statutory and regulatory requirements.
- (b) Satisfaction of the needs of SEBI/RBI/MCA inspectors to have access to certain records or records & documents sought by other regulatory bodies, tribunals and courts etc
- (c) Satisfaction of the needs of internal and external auditors to have access to certain records.

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation by which they are governed.

LOCATION OF RECORDS

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute shall be maintained at the corporate office of the Company or at any other place as may be approved by the Board, from time to time.

ACCESS AND AUTHENTICITY

The preservation of the records of the Company is vital in order to ensure all current and future access to the records. Preservation is also concerned with ensuring the authenticity of records.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the Custodian with preservation, so as to ensure integrity of records/documents and prohibit unauthorized access.

RECORD RETENTION SCHEDULE

The records referred to in Annexure A of this Policy shall be maintained permanently and the records which are required to be preserved permanently on the website of the Company shall be preserved in line with the Website Archival Policy of the Company.

Records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use, therefore disposal will aid efficiency. The records referred in Annexure B shall be preserved for at least 8 years (or higher years as may be prescribed) and thereafter as per the discretion of the Board records may be disposed of in the manner prescribed by it.

The Company shall maintain a register of preservation and disposal of records in the custody of the Compliance officer of the Company, wherein the brief particulars of the records preserved and/or removed from the location after the expiry of its preservation period shall be entered based on the information provided by the custodians. The register of preservation and disposal of records shall contain the following columns:

- a) Item Number;
- b) Brief Particulars of the records preserved/ disposed of;
- c) Date of creation of the record;
- d) Date of removal from the register/date of disposal;
- e) date of approval for disposal
- f) Whether preserved permanently or not; and
- g) Mode of destruction

This register of preservation and disposal of records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or electronic form.

RECORD APPRAISAL

The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process is to ensure the records are examined at the appropriate time to determine whether or not they are worthy of archival preservation, whether they need to be retained for a longer period as they are still in use, or whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the Board of the Company.

RISK-BASED APPROACH

The Company adopts a risk-based approach in an endeavor to preserve the collection of its records. A preservation risk assessment for the whole collection shall be conducted and subsequently shall be reviewed periodically. The result of the risk assessment would be used

to determine the urgency of preservation action: a low risk may simply indicate that the risk assessment should be recalculated at a future date, whereas a high risk will trigger immediate action.

COMPLIANCE OFFICER:

The Company Secretary of the Company shall be the Compliance Officer for the purpose of this policy.

EFFECTIVE DATE AND POLICY ENFORCEMENT

This Policy was approved by the Board of Directors in its meeting held on 08th February, 2016 and shall be effective from date of the approval and as amended by it from time to time.

DISCLOSURE

The Company shall disclose this Policy on its website i.e. www.ptcfinancial.com.

REVIEW OF THE POLICY

This Policy may be amended with the approval of the board as may be deemed necessary and in accordance with any regulatory amendments.

Should there be any inconsistency between the terms of the policy and the regulations, the provisions of the regulation shall prevail, any amendment to the regulation shall mutatis-mutandis be deemed to have been incorporated in this policy.

Footnote:

Version 0: Original policy dated 8th February, 2016

Version1: First amendment dated ____2024

Annexure- A

Indicative List

Records to be preserved permanently

Sl. No.	Document/Record
1	Certificate of Incorporation/ Commencement of Business and other related papers
2	Memorandum & Articles of Association
3	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
4	License and Permissions
5	Register of Members
6	Index of Members
7	Agreements made by the Company with Stock Exchanges, Depositories, etc.
8	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
9	Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10	Authorization / licenses obtained from any statutory authority
11	Policies of the Company framed under various regulations
12	Register of preservation and disposal of records
13	Register of Power of attorneys, if any
14	Certificates obtained from various statutory authorities
15.	Register of Inter Corporate Loans and Investments as per Companies Act, 2013 u/s 186
16	Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person)
17	Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)
18	Register of Charges

Annexure – B

Records to be preserved for minimum period of eight years (or any higher period prescribed under respective applicable law)

Item No.	Records	Period prescribed
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013	8 years from the date of satisfaction of charge
2.	Register of Inter Corporate Loans and Investments as per Companies Act, 2013	
3.	Annual Returns as per Companies Act, 2013	8 years from the date of filing with the ROC
4.	Register of Deposits as per Companies Act, 2013	
5.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013	
6.	Annual financial statements including: - Annual accounts -Directors report -Auditors report	
7.	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013	
8.	Income Tax Returns filed under Income Tax Act, 1961	
9.	All notices in form MBP – 1 received from Directors and KMPs/SMPs alongwith any amendment thereto	8 years from the end of financial year to which it relates
10.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013	
11.	Copy of newspaper advertisement or publications	
12.	All agreement entered into by the Company from the date of its termination	
13.	All show cause notice or any other notice received from any statutory , government	

	departments, Judicial or Quasi-judicial authority etc.	
14.	The attendance register of Board & Committee meetings	8 financial years from the date of last entry made therein and may be destroyed thereafter with the approval of the Board
15.	Office copies of Board meeting notices, agenda, notes on agenda and other related papers of the company	As long as they remain current or for 8 financial years whichever is later and may be destroyed thereafter with the approval of the Board
16.	Office copies of General Meeting notices, scrutinizers report & other related papers of the company	As long as they remain current or 8 financial years whichever is later
17.	Register of Debenture holders and other security holders along with the index	8 years from the date of redemption of debentures or securities
18.	Books of Accounts	8 Financial years