SMFG India Home Finance Company Limited

Policy on Preservation and Archival of Documents

Policy on Preservation and Archival of Documents

1. Background

The Company handles a variety of data and documents (defined in Annexure I of this Policy or Annexure thereof) as a part of its operations. These include physical documents and digital documents and data ("documents"). A policy on preservation of documents provides the framework for establishment of relevance and retention periods for documents, and the framework for ensuring safe-keeping, protection, traceability, retrievability and accessibility of documents. The Company, therefore, makes this policy, inter alia, in pursuance to Regulation 9 read with Regulation 51(3) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), on preservation of the documents to aid the Company in handling the documents efficiently. It not only covers the various aspects on preservation of the documents, but also their safe disposal/destruction.

2. Coverage

The Company's Policy for Preservation and Archival of Documents ('Policy') is framed in terms of regulation 9 and 51(3) of the Listing Regulations and other applicable guidelines.

The Policy has been divided into two sections –

i. **Part A** - Providing framework for establishment of relevance and retention periods for documents, and the framework for ensuring safe-keeping, protection, traceability, retrievability and accessibility of documents.
ii. **Part B -** Providing framework for ensuring disclosure, protection, maintenance and archival of the relevant information/ disclosures that are placed on the Company's website in accordance with Listing Regulations.

This Policy shall supersede all departmental level policies on preservation and archival of documents.

3. Definitions

Term used	**Definition**
Act	Companies Act, 2013
Applicable Law	Any law, rules, regulations, circulars, guidelines or standards under which the preservation of the documents and archival has been prescribed.
Authorized Person	Any person duly authorized by the Board, Managing Director, Whole Time Director, General Manager or any other competent person of the Company holding appropriate delegation by the aforesaid person and who is entrusted with the responsibility of maintenance and preservation of documents.

Term used	Definition
Compliance Officer	The person appointed by the Board as the Compliance Officer under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
Company	SMFG India Home Finance Company Limited
Current Document(s)	Any document, that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
Document(s)	Refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence with Authorities or in pursuance of applicable laws, minutes, indices, registers and or any other record/s, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper / print form or in Electronic Form and does not include multiple or identical copies.
Electronic Record(s)	The electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
Electronic Form	Any contemporaneous electronic device such as computer, laptop, compact disc, space on electronic cloud, or any other form of storage and 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.
Listing Regulations	The Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
Maintenance	Custody of documents in physical or electronic form
Offer document	Any document provided or issued with respect to invitation for subscription of Securities of the Company including but not limited to by way of public offer, private placement, preferential issue, rights issue, ESOP.
Preservation	To keep in good order and to prevent from being altered, damaged or destroyed.
SEBI	Securities Exchange Board of India.

Part A

Framework for establishment of relevance and retention periods for documents, and the framework for ensuring safe-keeping, protection, traceability, retrievability and accessibility of documents.

4. Period of preservation of Documents

Various categories of documents are preserved for different period as mentioned under various laws. Annexure 1 of this Policy categorizes the nature of the various documents and period of its preservation. Same can be referred by the owner of the various documents.

5. Modes of preservation

i. The documents should be preserved in –
   a. Physical form;
   b. Electronic form.
   c. Any other form that might be required under any applicable law.

ii. Storage and preservation of documents must allow for care, control, safekeeping and preservation of documents, ensuring that they are:
   a. Protected, secure and accessible as long as required as per applicable law;
   b. Adequately stored to prevent physical damage and/or loss;
   c. Stored in conditions that ensure long-term preservation of the document for as long as required; and
   d. Protected from unauthorised access, alteration and deletion.

iii. The preserved documents must be accessible at all reasonable times. Access shall be controlled by an Authorized Person who would ensure integrity of the documents and prohibit unauthorised access.

iv. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

v. Determination of mode of storage, where documents are available in physical and electronic form, should be made in consultation with the Compliance Officer.

vi. The Roles and Responsibilities of various functions under the Policy should be as follows:
   a. The Departmental Manager/ Functional Head/ Leadership Team Member should be responsible for establishing the list of documents to be preserved, the form of storage and period of storage as per the Applicable Law. The Authorised Person, responsible for storage and safe-keeping of the documents also should be designated by the Departmental Manager/Functional Head/Leadership Team Member.
   b. Respective functional Heads should be responsible for preservation of documents as per this Policy.
   c. The Authorised Persons should be responsible for storage and safe-keeping of the documents as per the retention standards prescribed in this Policy.
   d. Compliance function should be responsible for reviewing and certifying retention standards for each function
   e. Internal Audit and Operational Risk Management function should be responsible for confirming the controls.

6. Custody of the Documents

The custody of the Documents related to a function/department should be with the respective Authorized Person of the department/function. As and when the Authorized Person tender's resignation or is transferred from one department of the Company to another, the Functional Head should ensure that another person is authorized and such person takes over all the relevant Documents, in his possession from the person relinquishing his/her charge.

7. Destruction of documents

a. Documents referred in Annexure I, other than those required to be maintained permanently, shall be reviewed every year and actions to be taken to destroy the eligible Documents upon completion of the tenure specified therein. Document shall be destroyed with the approval of Functional Head.

b. Discarding as a normal administrative practice should occur for records that are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic documents.

c. The temporary documents, excluding the Current document(s) should be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the documents are stored as per the approved retention standard. The Documents for which special requests are made should be retained till destruction is specifically authorised by the Departmental Manager/Functional Head/LT Member.

d. A register of the documents disposed/destroyed should be maintained by the Respective Department. It should state the brief particulars of the documents destroyed, date of board/other approvals, if any, date of disposal/destruction and the mode of destruction.

8. Conversion of the form in which the documents are preserved

The physical documents preserved should be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space subject to compliance of the Applicable laws.

9. Authenticity

Where a document is being maintained both in physical form and in electronic form, the authenticity with reference to the physical form should be considered for every purpose.

Part B

Framework for ensuring disclosure, protection, maintenance and archival of the relevant information/ disclosures that are placed on the Company's website in accordance with Listing Regulations.

10. Hosting of information on the website

The information disclosed to the stock exchange shall be uploaded on the website of the Company, wherever required under Regulation 51(3) and 62(2) of the Listing Regulations and other applicable laws viz. https://www.grihashakti.com.

Secretarial Team shall be responsible for hosting of the disclosure on the Website of the Company, as above. Indicative list is provided in Annexure 2 of this Policy. Respective department shall be responsible for information uploaded on the website of the Company under various law including updation and archival of the documents uploaded.

Information hosted on the website of the Company shall be held for a period of five years from the date of first hosting of such information. Any change in the information hosted on the website shall be updated within two working days from the date of such change.

The Website hosting service provider/Marketing/Secretarial Team shall monitor on a quarterly basis to address and fix the quality and compatibility issues around the following parameters:

i. Functionality: All modules of the website are tested for their Functionality for their smooth working.
ii. Performance: All important pages of the website are tested for the download time.
iii. Broken Links: The website is thoroughly reviewed to rule out the presence of any broken links or errors.

11. Archival of information hosted on the website

Secretarial Team shall raise the request on a quarterly basis, for the information hosted on the website of the Company in terms of regulation 51 of the Listing Regulations to be moved to the archival folder after a period of 5 years from the date on which such information was hosted or after such period as allowed under applicable Guidelines. The archived folder would be available for a period of one year.

After the expiry of period of one year, the archived information will be removed from the website of the Company.

12. Access to archival folder

The contents of the archived folder shall be accessible to public, on the website of the Company.

13. Dissemination of Policy

This Policy or it abridges form shall be available on the website of the Company.

Policy on Preservation and Archival of Documents
Annexure I

<table>
<tr><th>PERMANENT PRESERVATION</th><th>TEMPORARY PRESERVATION</th></tr>
<tr><td colspan="2">I. Companies Act, 2013</td></tr>
<tr><td>
• Certificates issued by the Registrar of Companies;
• Certificates/ Authorization / licenses obtained from various statutory authorities;
• The Memorandum and Articles of the Company;
• Affidavit from the subscribers to the memorandum and from persons named as the first directors;
• Register of members;
• Register of Directors & KMP;
• Register of Loans, guarantee, Securities and acquisition made by the Company;
• Books and Documents relating to the issue of share certificates, including the blank forms of share certificates;
• Annual Report;
• The foreign register of members;
• Minutes of meetings of Board, Committees of Board and Shareholders meetings; ;
• Register of charges;
• Register of investments made by the Company not held in its name.
• Register of contracts or arrangements in which directors are interested.
• Forms and returns filed with the Registrar of Companies, Ministry of Corporate Affairs, SEBI or any other regulatory authority.
• Record of Private Placement (PAS-5);
• Policies of the Company framed under various regulations;
• Agreements made by the Company with Stock Exchanges, Depositories;
</td><td>
❖ Preservation for 8 years
• Instrument creating a charge or modification thereon;
• Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto;
• Attendance registers of Board and Committee meetings.
• All notices pertaining to disclosure of interest of directors;
• All certificates surrendered to a company;
• Instrument creating a charge or modification after satisfaction;
• Registers of Debenture holders;
• Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013;
• Copy of newspaper publications w.r.t. financial results;
❖ Preservation for 3 years
• Recordings of meetings;
</td></tr>
<tr><td colspan="2">II. Secretarial Standard</td></tr>
<tr><td>Minutes of Board meeting (SS-1)</td><td>Office copies of Notices, scrutinizer’s report, and related papers (10 years from the date of document)</td></tr>
</table>

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
III. SEBI	
	❖ Preservation for 8 years from the date of event • All event-based disclosures • Quarterly, Half Yearly and Annual Reports filed with Stock Exchange • Intimation of Board Meetings • Structural Digital Database • Initial and continuous disclosure.
IV. Accounts and Taxation	
• Income tax returns and filings; • Tax Exemption and Related documents; • General Ledger; • PAN, TDS, GST certificates; • Original Tax fillings and assessment orders (inld Tax Audit reports); • Original Tax payment challans; • Indirect Tax Registration certificate; • RBI Certificates; ***Note:*** *Hard copy of documents shall be stored in Cupboard and digital is stored in Tac-Folder for Taxation related documents and Finance Audit Folder for Finance related documents.*	❖ Preservation for 8 Financial years • Day Books; • Records relating to inter office transaction; • Inspection, Audit Reports, Statutory Audit Reports etc.; • Certificates, Opinion, Books of Accounts including voucher etc.; • Accounting records based on which Income Tax/GST/Service Tax returns are filed; ❖ Preservation for 10 years from the date of event • Returns filed with RBI both in physical and digital forms. If any assessment/litigation are pending under any law, then above-mentioned period or completion of assessment/litigation, whichever is later.
V. Legal	
• Court Orders; • Patents, trademark registrations, copyright registrations; • Business / JV/SPA/Loan/Lease Agreements; • Legal Opinions;	❖ Preservation for 3 years from the date of closure of litigation • Legal Memoranda subject matter files, litigation files etc.; • Contracts, Agreements and Related correspondence;
VI. Customer Service	
• Communication from Customers and to Customers for L1 Channel • Units Process Documents	❖ Preservation for 8 years • Written communication from and response to customers; • Copy of RBI complaints, escalation including response to customers; • Copies of Proof of deliveries; • Undelivered Written communication to customers; ❖ Preservation for 5 years • Electronic data of customer interactions;

	❖ Preservation for 3 years • Vendor Agreements, SOPs ❖ Preservation for 6 months • Call recording of customer's calls received in Call Centre; • MIS/Unit Reporting
VII. Regulatory documents (RBI) – Owner shall be concerned Department	
• Certificate issued by RBI; • Form FC – GPR, FC – TRS, ARF etc.; • Inspection Report issued by RBI.	❖ Preservation for 5 years (after the business relation is ended) • All necessary records of transactions between the Company and the customers, both domestic and international; • Records pertaining to the identification of the customers and their addresses obtained while opening the account and during the course of business relationship; • Returns filed with FIU-IND Viz. CTR, NTR, CCR STR, darpan etc.
VIII. FCU – results of Investigation as per Company's internal Policies	
	❖ Preservation for 7 years from the closure of investigation. • Disciplinary Action Proceeding, domestic Enquiry, results of investigation etc. against the employees as per Company's internal policy; • Documents related to investigation of frauds, results of investigation etc. conducted by FCU.
IX. HR	
• Salary Register/Payroll Registers; • Bonus & Gratuity Records; • Statutory Registers and other Statutory Records;	❖ Preservation for 7 years from the event date/closure of investigation • Statutory Returns / Challans – PF, ESI, P. Tax Etc.; • Employee File – Joining Docs, KYCs, Appointment Letter, Increment/ Promotion Letters, termination/resignation; • Disciplinary Action Proceeding, domestic Enquiry, results of investigation etc. against the employees, where investigation is conducted by HR as per Company's internal policy; • Details of any gifts offered received as per Anti-Bribery and Anti-Corruption Policy. • Any reference/complaint received about any violation, investigation, disciplinary actions etc. in entirety.
	• Data on trainings, declarations submitted by the APs periodically as per Anti- Bribery and Anti-Corruption Policy

X. Business/Operations	
	• Customer loan files & documents including KYC records of customers for a period of 8 years from closure of loans; • Manual receipts to collect payments from customers shall be preserved for a period of 5 • years.
XI. Enterprise Service Management	
• Original Purchase and Sale Agreement; • Property Card, Index II, Ownership records issued by Government Authority • Property Insurance documents;	❖ Preservation for 8 years from the date of termination/expiry • All PO and Bills of payment (As per taxation requirement); • Licenses/permissions issued by Government Authority (As per taxation requirement); • Lease rent Agreement from the date of termination of lease rent; • Documents pertains to Vendor Empanelment (Administrative Set of documents & KYC) • All Service Level agreement, LOI, Contracts from date of expiry/termination.
XII. IRDA (Registration of Corporate Agents) Regulations, 2015 (IRDAI Regulation)	
	❖ Preservation for 10 years from License Validity Date/Last Working Day of PO/SP: • Principal officer and Specified Person certificates; • Training completion certificate, Exam score card and Application form (SP & PO) • Fit & Proper declarations, code of conduct, SP licensing form and documents, SP Register; • IRDAI Communication; • Certificates of Registration; • Preservation for 10 years from termination: • Customers documents Premium Register; • Group Policies • Agreement with Insurance Partners ❖ Policies and Process shall be preserved for 10 years from the date of surrender of Corporate Agency License.

	Other documents referred in regulation 31 of IRDAI Regulation shall be retained for a minimum period of ten years from the end of the year to which they relate. Company shall maintain additional records including in electronic form as per regulation 30 of IRDAI Regulation and shall be made available as and when required by IRDAI. However, the documents pertaining to the cases where claims are re-opened and the settlement is pending for a decision from courts, the documents are required to be maintained till the disposal of the cases by the court.
XIII. Marketing Team	
Patents, trademark registrations, copyright registrations;	
XIV. Treasury Team	
Minutes of ALCO and Borrowing Committee meeting	

Other Documents not covered above

a. Where there is a period for which a document is required to be preserved as per Applicable Law, shall be preserved for the period as required under the said Law by the respective department.
b. Where there is no such requirement as per Applicable Law, then for such period as the respective owner decides.
c. In case of any other document, for such period, as a competent officer of the Company required to handle or deal with the document, takes a considered view about its relevance; provided that generally speaking, a document may be preserved for a minimum period of 8 financial years from the date on which the document was originated.

Documents which may be destroyed as normal administrative practice (indicative):

- Catalogues;
- Copies of press cuttings, press statements or publicity material;
- Letters of appreciation or sympathy;
- Requests for copies of maps, plans, charts, advertising material (subject to clause on destruction of documents);
- Facsimiles where a photocopy has been made;
- Telephone messages;
- Drafts version of any reports, correspondence, speeches, notes, spread sheets, etc. (subject to clause on destruction of documents);
- Routine statistical and progress reports compiled and duplicated in other reports (subject to clause on destruction of documents);

Annexure II

Below is the list of information to be hosted under a separate section on the Website of the Company:

i. Details of business of the Company;
ii. Composition of Board of Directors:
iii. financial information including:
   - notice of meeting of the board of directors where financial results shall be discussed;
   - financial results, on the conclusion of the meeting of the board of directors where the financial results were approved;
   - complete copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report etc;

iv. Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances;
v. The email address for grievance redressal and other relevant details;
vi. The name of the debenture trustees with full contact details;
vii. The information, report, notice, call letters, circulars, proceedings etc. concerning non-convertible redeemable preference shares or non-convertible debt securities;
viii. All information and reports including compliance reports filed by the Company
ix. information with respect to the following:
(i) default by issuer to pay interest or redemption amount;
(ii) failure to create a charge on the assets;
x. all credit ratings obtained by the entity for all its listed non-convertible securities, updated immediately upon any revision in the ratings;
xi. statements of deviation(s) or variation(s) as specified in sub-regulation (7) and sub-regulation (7A) of Regulation 52 of LODR;
xii. Annual return as provided under section 92 of the Companies Act, 2013 and the rules made thereunder;
xiii. Terms and conditions of appointment of Independent Directors;
xiv. Composition of various Committees of Board of Directors;
xv. Code of conduct of Board of Directors and Senior Management Personnel;
xvi. Details of establishment of Vigil Mechanism/ Whistle Blower Policy;
xvii. Criteria of making payments to non-executive directors, if the same has not been disclosed in annual report;
xviii. Policy on dealing with Related Party Transactions;
xix. Policy on internal guidelines for Corporate Governance
xx. Code of Fair Disclosure
xxi. Details of familiarization programs imparted to Independent Directors including the following details:
   - Number of programs attended by Independent Directors (during the year and on a cumulative basis till date),
   - Number of hours spent by Independent Directors in such programs (during the year and on cumulative basis till date), and

- Other relevant details

xxii. The name and contact details of Principal Nodal Officer along with the details of the complaint lodging portal of the Ombudsman.
xxiii. Customer Education documents providing guidance on IRACP norms
xxiv. Fair Practice Code of the Company (In the language understood by the borrower)
xxv. Rate of interest and approach for gradation of risk
xxvi. Names of Digital lending platforms engaged as agents
xxvii. Public disclosure on liquidity risk and LCR
xxviii. Details of agreements entered into with the media companies and/or their associates, etc.;
xxix. New name and the old name of the listed entity for a continuous period of two years, from the date of the last name change;
xxx. In the event of termination of the outsourcing agreement for any reason in cases where the service provider deals with the customers, the same shall be publicized by displaying at a prominent place in the branch, posting it on the website, and informing the customers so as to ensure that the customers do not continue to deal with the service provider.
xxxi. Additional items as per Regulation 62 of LODR as updated from time to time;