

## **FINSTARS CAPITAL LIMITED**

### **POLICY FOR - DOCUMENT RETENTION AND ARCHIVAL OF DOCUMENTS**

Policy on Preservation of documents and archival of the documents in the website (Pursuant to Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

#### **1. INTRODUCTION**

The purpose of this document is to present policy statement for Finstars Capital Limited (‘Company’) regarding preservation of its documents and archival of documents in the website in accordance with the provisions of the Companies Act, 2013 and Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”). 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. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

#### **2. PURPOSE OF THE POLICY**

The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015. As per the requirement of Regulation of 30(8) of LODR, the Company shall disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under LODR, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website Under Chapter III of LODR, the Company has to ensure that significant documents are safeguarded and preserved including those in electronic mode.

#### **3. DEFINITIONS “Policy” means this Policy on preservation of documents and archival of documents in the website.**

#### **4. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED**

The Company’s physical and electronic documents shall be classified for the purpose of preservation as follows:

- A. Documents whose preservation shall be permanent in nature;
- B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions.

The documents as specified in A and B above may be kept in electronic mode also. The list of documents for the above categories is given in the “Annexure” to this Policy.

5. **RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS**

All the Employees on 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.

6. **SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS :**

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation end.

7. **STATUTORY REQUIREMENTS:**

If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

8. **WEB ARCHIVAL POLICY :**

The Company shall disclose on its website all events or information which has been disclosed to Stock Exchange(s) and retain the same for period of five years. At the end of five years, the information shall be archived and preserved for a further period of three years.

9. **POLICY REVIEW**

The Managing Director of the Company is authorized to periodically review the policy and make such changes as considered necessary.

**For Finstars Capital Limited**  
**Mr. Barun More**  
**Chairman & Managing Director**

## **FINSTARS CAPITAL LIMITED**

### **ANNEXURE-1**

#### **A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:**

1. Accounting and Finance records including Annual Financial statements and Audit Reports;
2. Investment records;
3. Tax records including annual returns;
4. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks;
5. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records; Registration Certificates with any other Regulatory bodies .
6. Personal files of individual employees (Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc);
7. Any other record as may be decided by any KMP (as per Companies Act 2013) or the Managing Director or the Board of Directors of the Company from time to time;
8. Filings with Registrar of Companies.

### **ANNEXURE-2**

#### **B. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:**

1. Bank Statements and vouchers;
2. Filings with Stock Exchanges and other statutory authorities;
3. Corporate Social Responsibility Records;
4. Sponsorship Projects Records;
5. Correspondence and Internal Memoranda;

6. Any other record as may be decided by the Managing Director of the Company from time to time;
7. Security Deposit Receipts (after receipt of deposit money back);
8. Tender Documents;
9. Lease Deeds and Contracts;
10. Legal files;
11. Insurance Records including policies and claims;
12. All e-mail correspondence, internal & external;
13. Any other record as may be decided by the Managing Director of the Company from time to time.