

**TRIUMPH**  
**INTERNATIONAL**  
**FINANCE INDIA**  
**LIMITED**

**POLICY ON PRESERVATION  
OF DOCUMENTS**

## **POLICY ON PRESERVATION OF DOCUMENTS**

### **INTRODUCTION**

This policy is in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also beneficial for the safe disposal/destruction of the Documents and keeping a record of the same.

### **DEFINITIONS**

- a) **“Act”** means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.
- b) **“Applicable Law”** means any law, rules, circulars, guidelines or standards under which the preservation of the Documents has been prescribed.
- c) **“Authorised Person”** means any person duly authorised by Board of Directors.
- d) **“Board”** means the Board of directors of the Company or its Committee.
- e) **“Books of Account”** as per Section 2(13) of the Companies Act 2013 includes records maintained in respect of—
  - i. all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place;
  - ii. all sales and purchases of goods and services by the company;
  - iii. the assets and liabilities of the company; and
  - iv. the items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section;
- f) **“Company”** means Triumph International Finance India Limited.
- g) **“Current Document(s)”** means any Document that has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- h) **“Document”** as per section 2(36) of the Companies Act 2013 includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- i) **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- j) **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy 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.
- k) **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- l) **“Preservation”** means to keep in good order and to prevent from being damaged or destroyed.
- m) **“Register”** means documents and records required to be maintained under:

- a. The Companies Act 2013 and Rules thereunder
  - b. SEBI Regulations
  - c. Secretarial Standards
  - d. Any other law for the time being in force
- n) **“Records”** means documentary evidence of past events or transactions.
- o) **“Regulations”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

**PRESERVATION OF DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:**

- i. Certificate of Incorporation
- ii. Certificate of Commencement of Business
- iii. Memorandum & Articles of Association
- iv. License, Certificate, Registration Documents obtained from various Statutory Bodies in India
- v. Material Agreements/Contracts.
- vi. Minutes of the Meeting of Board & its Committees
- vii. Minutes of the Meeting of Shareholders
- viii. Statutory Registers required under the provisions of Companies Act 1956 & 2013
- ix. Policies of the Company framed under various regulations
- x. Register of disposal of records.
- xi. All kinds of Court Orders
- xii. Such other records as required under any law from time to time

**DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN 8 YEARS**

- i. Annual Return(s)
- ii. Book Agenda and supporting Documents
- iii. Attendance register
- iv. Books of Accounts
- v. Audited Financial statements
- vi. Accounting and Corporate Tax records
- vii. Office copies of Notice of General Meeting, and related papers
- viii. Office copies of Notice of Board Meeting/ Committee Meeting, notes on Agenda and other related papers
- ix. All notices pertaining to disclosure of interest of Directors
- x. Instrument creating a charge or modification
- xi. Register of debenture holders or any other security holder
- xii. Bank records
- xiii. Employment, Employee & Payroll records
- xiv. Insurance related documents

- xv. Correspondences with Departments/Shareholders
- xvi. Non-statutory registers/Documents
- xvii. Such other records as required under any law from time to time.

**MODES OF PRESERVATION**

The documents may be preserved in

- i. Physical Form or
- ii. Electronic Form.

**CUSTODY OF THE DOCUMENTS**

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person, Where the Authorised Person 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 Disc, other storage devices or such other Documents and devices in his possession and such authorised person taking possession of documents needs to change the password.

**DESTRUCTION OF DOCUMENTS**

The period stated above is minimum retention/preservation period. Prior to actual destruction/disposal in terms of this policy, the retention schedule may be reviewed by the Authorised Person if required due to an on-going business use, internal audit requirement or any other like reason.

The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period by the Authorised Person in whose custody the Documents are stored after the prior approval of the Finance Committee of the Company. Electronic documents shall be removed after the expiry of prescribed retention period from all identified electronic repositories.

A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the Authorised Person.

**Specimen format of the register of documents disposed of / destroyed**

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON

### **CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED**

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

### **INTREPRETATION**

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, regulation or standard.

### **AMENDMENTS**

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.