

**POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS
IN WEBSITE**

1. Preface

Pursuant to Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (Listing Regulations), the Board of Directors ("the Board") of Upasana Finance Limited ("the Company") has adopted this Policy vide Circular Resolution on 29th March 2016 on preservation of documents and archival of documents.

2. Objective

To ensure that the Company

- complies with document retention laws;
- allow for continuity in the event of a disaster
- retains valuable documents and saves time, money and space;
- protects against allegations of selective document destruction; and
- provides for a routine destruction of non-business, superfluous, and outdated documents.

3. Preservation of Documents

Generally all corporate records of the Company are to be retained for a period not less than eight years and may be destroyed thereafter, except those specifically mentioned hereunder:

SL NO	DESCRIPTION OF DOCUMENT	PERIOD OF MAINTENANCE
1	Minutes of meetings of the Board of Directors and any Committee thereof	To be maintained permanently
2	Board/Committee Meeting notices, agenda, agenda notes and other papers	To be maintained for a period of eight years (or as long as they are in vogue, whichever is later) and may be destroyed thereafter after obtaining specific approval of the Board.
3	Minutes of general meetings of members or any other security holders or class meetings, including those held through postal ballot	To be maintained permanently
4	Notices of general meetings of members or any other security holders or class meetings, including those held through postal ballot, scrutinisers'	To be maintained for a period of eight years or as long as they are in vogue, whichever is later and may be destroyed thereafter after



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	reports and other related papers	obtaining specific approval of the Board, and where applicable with the approval of the Central Government.
5	All registers maintained under the Companies Act 1956/2013	To be maintained permanently
6	Books of Accounts	To be maintained for eight years after completion of relevant transactions for which the records were last used, unless a longer period is specifically mentioned in the applicable statute.
7	Income Tax & Service Tax records	To be maintained for eight years after completion of relevant assessment year for which the records were last used, unless a longer period is specifically mentioned in the applicable statute.
8	Registrar of Companies (ROC & MCA) Records	To be maintained permanently.
9	Audited annual financial statements, Reports of Board of Directors and of Auditors	To be maintained permanently
10	Prospectus relating to securities issued and the letters of approvals of SEBI and/or stock exchanges for such issues, including permission for listing and trading.	To be maintained permanently
11	All other papers relating to issue of securities	To be maintained for a period of eight years
12	Declarations, disclosures and certificates given by Directors and Key Managerial Personnel	To be maintained for a period of eight years
13	Quarterly, half yearly and annual financial results (audited or unaudited), together with Assets and Liabilities Statement, as may be applicable, and the Limited Review Report/Auditors Report, Shareholding Pattern, Corporate Governance Reports, and all other forms and announcements filed with stock exchanges	To be maintained for a period of eight years



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14	Hire Purchase Agreements and related documents involving any legal dispute	To be maintained for a period of eight years or until the legal dispute, if any, has come to a close, whichever is later
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5. Document retention

Any document that is required to be maintained by law should be retained for the time and in the form that is mandated by law. The period of retention listed in the schedule is based on the time limits for potential judicial claims and aims to draw sensible conclusions as to how long keeping the records will protect the Company. In general, documents that are not subject to a retention requirement should be kept long enough to accomplish the task for which they were generated.

Where the recommended retention period given is eight years, this is based on the eight year time limit within which legal proceedings must be commenced. Where documents may be relevant to a contractual claim, it is recommended that these be retained for at least the corresponding eight year limitation period.

Each record of information should entail identifying when the retention period of each record is due to expire and taking immediate action to ensure its destruction in a proper and secure manner.

The Company has a legal duty to retain relevant documents which it knows or believes may be relevant to any legal action.

6. Archival of information or documents in website

The Company is posting information as may be required by Listing Regulations and other Regulations / statute for information of the stakeholders. These information shall be maintained for a period of five years from the date of posting or till such time they remain in vogue, whichever is later. Thereafter this information can be archived.

7. Amendment

The Board of Directors shall have the right to withdraw, substitute and/or amend this Policy at any time as it may deem necessary and appropriate. The decision of the Board in this respect shall

