



M Power Micro Finance Private Limited
Policy on Preservation of the Documents

[In term of Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”)]

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1. Scope

A policy on preservation of Documents (defined below) would ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("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 the safe disposal/destruction of the Documents.

2. Definitions –

- 2.1 **"Act"** means the Companies Act, 2013.
- 2.2 **"Applicable Law"** means any law, rules, regulations, notifications, circulars, guidelines etc. or standards issued by Ministry of Corporate Affairs, Securities Exchange Board of India, Stock Exchange, Registrar of Companies and such other authorities governing over the affairs of the Company.
- 2.3 **"Authorized Person"** means any person duly authorized by the Board.
- 2.4 **"Board"** means the Board of directors of the Company or its Committee.
- 2.5 **"Company"** means M Power Micro Finance Private Limited
- 2.6 **"Current Document(s)"** means any Document that has an ongoing relevance with reference to any filings, litigation, proceedings, complaint, dispute, contract or any like matter.
- 2.7 **"Document(s)"** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, 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 or in Electronic Form and does not include multiple or identical copies.
- 2.8 **"Electronic Record(s)"** means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- 2.9 **"Electronic Form"** means 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.
- 2.10 **"Maintenance"** means keeping Documents, either physically or in Electronic Form.
- 2.11 **"Preservation"** means to keep in good order and to prevent from being tampered, altered, damaged or destroyed.



2.12 **“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.

3. Objective

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in following categories:

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is “Current”.
- c) In case of any other Document, for such period, as a competent officer of the Company required handling or deal with the Document, takes a considered view about its relevance;

Provided that the Company may keep the Documents in electronic form.

- ❖ An indicative list of the Documents and the timeframe of their preservation is provided in Annexure I.

5. Modes of preservation

- 5.1 The Documents may be preserved in
Physical Form or
Electronic Form
- 5.2 The officer of the Company required to preserve the Document shall be Authorized Person who is generally expected to observe the compliance of requirements of Applicable Law.
- 5.3 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.
- 5.4 The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

6. Custody of the Documents.

Subject to the Applicable Law, the custody of the Documents shall be with the Authorized Person. Where the Authorized 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 Company Disc, other storage devices or such other Documents and devices in his possession under the Policy.



7. Authority for approval of Policy & Alterations in policy.

This policy is approved by the Board of Directors of and reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

8. Destruction of Documents

8.1 Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents.

8.2 The temporary Documents, excluding the Current Document(s) may be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved.

The categories of Documents may be destroyed as normal administrative practice is listed in Annexure II.

The Documents shall be destroyed in the presence of at least one officer of the Company.

8.3 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, mode of destruction, person destroying the Document and the person in whose presence Document destroyed.

8.4 The entries in the register shall be authenticated by the Authorized Person.

9. 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.

The Documents preserved in Electronic Form may be converted, whenever required or felt necessary, into physical form.

10. 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.

11. Interpretation

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



Annexure – I

The Company from time to time to establish policy on preservation of Documents for specific categories of records in order to ensure legal compliance and also to accomplish other objectives, such as preserving intellectual property and cost management. Several categories of documents that bear special consideration are identified below. While minimum preservation periods are suggested, the preservation of the Documents identified below.

The preservation period for Documents not included in the below categories should be determined primarily by the application of the general guidelines affecting document and as per the Applicable laws, rules, regulations, byelaws etc.

Document	Preservation Period
<p>Tax Records Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, returns and other documents concerning the Company's expense and revenues.</p>	Eight years from the date of filing the applicable return.
<p>Corporate Records The Documents like the memorandum and articles of the company, Register of members, Books and Documents relating to the issue of securities, Annual return, Register of charges, Minutes book of general meeting, board meeting and committee meeting, register of directors, key managerial personnel and other Document prescribed under Companies Act, Securities Laws and other allied Laws.</p>	The Documents should be preserved for a period prescribed under Applicable Laws.
<p>Accounting and Financial Records The Accounting and Financial Records like balance sheet, profit & loss account, cash flow statement, notes and schedules forming part of foregoing, accounting entries, vouchers, bills, receipts, challans etc.</p>	The Documents should be preserved for a period of eight years after the close of the financial year.
<p>Employment / Personnel & HR related Records. Several Central & State statutes require the Company to keep certain recruitment, employment and personnel information. The Company should keep employee's personnel files that contain employee's basic information, performance review, any complaints brought against the Company or individual employees, actions taken by or against such personnel.</p>	Employment and personnel records should be retained for six years after cessation of the employee.
<p>Press Releases / Public Filings The Company should retain copies of all press releases and publicly filed documents under the theory that the Company should have its own copy to test the accuracy of any document that a member of the public can theoretically produce against that Company.</p>	Press releases / public filings related documents should generally be maintained for a period of eight years or till the completion of the matter case, whichever is later.



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<p>Legal Files As a part of its business activity, the Company requires to execute several legal Documents like deed of hypothecation, deed of mortgage, lease deed, leave and license agreement, promissory notes and other similar/incidental/ ancillary Documents.</p>	<p>Legal Documents should generally be maintained for a period of eight years after the expiry of the life of Document.</p>
<p>Documents relating to customers, customer loan documents etc. The Company should keep final copies of documents relating to customers, customer loan documents etc.</p>	<p>Generally eight years.</p>
<p>Documents maintained in Electronic Form. Subject to above, the Documents maintained in Electronic Form including emails should be maintained for the appropriate amount of time depending upon the subject matter and should be determined primarily by the application of the general guidelines affecting Document preservation. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods should be exercised on a regular basis.</p>	<p>Maintained for the appropriate amount of time depending upon the subject matter and should be determined primarily by the application of the general guidelines affecting Document preservation.</p>