

SUNDARAM HOME FINANCE LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

PREAMBLE:

This policy is formulated in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

OBJECTIVE:

The purpose of this policy is to have a binding framework for the preservation of documents of Sundaram Home Finance Limited (hereafter, the Company), as approved by the Board of Directors of the company, who shall broadly classify them in the following two categories:

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

DEFINITIONS:

- a. "Documents" shall mean statutory registers, returns, forms etc. required to be maintained and preserved by the Company in physical or electronic form under the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996, and the provisions of the Companies Act, 1956 and Companies Act, 2013 and such other records under various laws applicable to the Company.
- b. "Electronic Record" shall mean the electronic record as defined under Section 2(1)(t) of the Information Technology Act, 2002.
- c. "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.
- d. "Maintenance" means keeping Documents, either physically or in Electronic Form.
- e. "Preservation" means to keep the documents preventing them from being altered, damaged or destroyed.

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.

STORAGE AND ARCHIVAL OF DOCUMENTS:

The Company shall preserve and maintain all its documents in the prescribed format either in physical or electronic mode as per the requirements of the applicable provisions, rules and regulations from time-to-time.

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 and must be accessible at all reasonable times The Company has made appropriate provision for back-up of its digital collections, including the provisions of offsite security copies..

The policy should be reviewed periodically by the Management and the amendments effected to subject to approval of the Board of Directors if and when practical difficulties are encountered. The Management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time-to-time.

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure - A**.

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.

DESTRUCTION OF RECORDS:

The records/documents preserved shall be reviewed every year or according to need by the respective department. The need for destruction of the documents so preserved shall require the approval of the Managing Director.

AMENDMENT:

The Board has the right to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever, subject, however, to the condition that such alterations will be in consonance with the provisions of the applicable Law.

ANNEXURE – A

Indicative List

A. PERMANENT PRESERVATION

The Company shall maintain the following documents on a permanent basis:

- a. Common Seal Register
- b. The Memorandum and Articles of Association
- c. Board of Directors Records i.e. Minutes of General Meetings, Board Meetings and various Committee Meetings along with a copy of all the materials provided to the Board of Directors or Committees of the Board
- d. Statutory Registers required under applicable laws
- e. Annual Audit Reports and Financial Statements
- f. Licence and Permissions granted by various authorities
- g. Execution copies of all Contracts and Agreements entered into by the Company
- h. Register of Deposits accepted by the Company
- i. Statutory Compliance documents and disclosures except for routine compliance
- j. Original Documents relating to Sale/ Purchase of any property in the name of the Company

B. TEMPORARY PRESERVATION UPTO 8 YEARS

The Company shall maintain the following documents on a temporary basis:

- k. Attendance Registers, copies of Notice of General Meeting, Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- l. Copies of Annual Report and Annual Returns
- m. All notices pertaining to disclosure of interest of directors
- n. Press releases and Publicly filed documents along with all documents filed with the Stock Exchanges
- o. Instrument creating a charge or modification
- p. Books of accounts, Ledgers and Vouchers and Tax and Insurance records
- q. Register of Debenture Holders or any other security holders
- r. Correspondences with Departments/shareholders
- s. Employment records/Personnel documents that include recruitment, employment and personal information. These records also reflect performance reviews and any other matters arising out of the course of employment, such as actions taken against the personnel
- t. Relevant Marketing and Sales documents
- u. Legal documents and Intellectual property records relating to the development and protection of the intellectual property rights

C. OTHERS

Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.