



POLICY FOR PRESERVATION OF DOCUMENTS & ARCHIVAL

[Pursuant to Regulation 9 of the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015)]

This document shall supersede Policy for preservation of the Documents if any in the Company, and should be read in conjunction with the most recent policies/code and procedures documented and held on file.

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INTRODUCTION

Inditrade Capital Ltd (formerly known as JRG Securities Ltd.) (Inditrade) is one of India's leading financial services providers with strong presence in South India. It was incorporated in 1994 and over the years, it has acquired a name of trust through Equity and Commodity Broking businesses. Inditrade is listed on the Bombay Stock Exchange and has a diverse set of public shareholders. The Company is a member of the National Stock Exchange of India Ltd (NSE) and the Bombay Stock Exchange (BSE Ltd). Inditrade is a full-fledged depository participant of the National Securities Depository Ltd and Central Depository Services (India) Limited. The Company along with its group companies is committed to be fully compliant with all regulatory compliances with the exchanges, SEBI, IRDA, MCA and RBI and hence is required to maintain diverse set of documents. Further Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") has imposed certain obligations on all listed entities. Pursuant to Regulation 9, it is the obligation of the company to formulate and put in place a policy for preservation of documents. This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

LEGAL FRAMEWORK & PURPOSE OF POLICY

The Corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy. This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange

Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy also intends to aid the employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements. The policy contains 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. The policy outlines the procedure to create, maintain and lawfully dispose of the records and also assigns responsibilities for their preservation to the departments concerned and its specific staff.

CLASSIFICATION OF RECORDS

This policy classifies corporate records of the Company, both physical and electronic, into two categories as mentioned below:

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

The classification of the documents has been made in the **Annexure I** which forms part of this Policy. While prescribing different time periods for preservation of records, the following aspects have been taken into account:

- (a) Compliance with statutory and regulatory requirements.
- (b) Requirements of SEBI/RBI/MCA/Income tax/EPF officials to have access to certain records.
- (c) Requirements of internal and external auditors to have access to certain records.

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation, for the time being in force.

MODES OF PRESERVATION

The Documents may be preserved in the following modes:

- a) Physical form or
- b) Electronic Form.

The Documents should be preserved in such a way so as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents. The preserved documents must be accessible to the persons concerned at all reasonable times. Access may be controlled by Authorized Persons with preservation, so as to ensure integrity of the documents and to prohibit unauthorized access.

ROLES & RESPONSIBILITIES

All the employees of the Company are responsible for the preservation of the documents pertaining to their department and their respective Departmental Heads shall be responsible for monitoring the maintenance, preservation and destroying of documents in respect of the areas of operations falling under their charge. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness tool helping the Company's staff and external legal counsel to track down documents to handle the legal cases.

LOCATION OF RECORDS

As mandated by the Companies Act, 2013 or under any other statute, records shall be located at the registered office of the Company or their Branches as the case may be. The records for which no specific place has been specified under any statute may be maintained at the registered office of the Company or at any other place as may be, decided by the officers of the Company considering their utilization and usefulness.

RECORD APPRAISAL

The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process shall be to ensure that the records are examined at the appropriate time to determine (i) whether or not they are worthy of archival preservation; (ii) whether they need to be retained for a longer period as they are still in use; or (iii) whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the Company Secretary and Chief Financial Officer of the Company.

DESTRUCTION OF DOCUMENTS

Records should not be kept longer than it is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use. Destruction as a normal administrative practice usually occurs when the records are duplicated, or are unimportant or for short term use only. This applies to both Physical and Electronic Documents. 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 Board or any other authority if any as required under the Applicable Law pursuant to which the documents have been preserved. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Departmental Heads who are disposing of the Documents in the format prescribed at **Annexure II**.

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all employees of the Company for suspension of further disposal of Documents.

REVIEW OF THE POLICY

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments. The Board shall make such alterations to this Policy as considered appropriate, subject to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

ANNEXURE I

CLASSIFICATION OF THE DOCUMENTS

1. Accounts and Finance		
Sl. No	Record Type	Retention Period
1.	Annual Audit Reports and Financial Statements	Permanent
2.	Annual Plans and Budgets	8 Years after completion of Audit
3.	Books of Accounts, Ledgers and Vouchers	8 Years from the end of Financial Year or completion of assessment under Income Tax whichever is later
4.	Bank Statements and cancelled cheques and unused cheque books	8 Years
5.	Investment Records	8 Years
6.	Fixed Assets Registers and Depreciation schedule and calculation	8 Years
7.	General Correspondence	8 Years
2. Tax Records		
1.	Tax Exemption and Related documents if any	Permanent
2.	Tax Bills, Receipts and Payments	Permanent
3.	Tax Deducted at Source Records and TDS Returns with Acknowledgment copies and TAX Audit documents	8 Years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.
4.	Income Tax Papers and Returns	8 Years from the end of Financial Year or completion of assessment under Income Tax whichever is later
5.	VAT Documents and Returns	8 Years from the end of Financial Year or completion of assessment under Service Tax whichever is later

6.	Service Tax Papers and Returns and audit documents	8 Years from the end of Financial Year or completion of assessment under Service Tax whichever is later
3. Legal Files and Records		
1.	Court Orders	Permanent
2.	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 Years after termination or expiration
3.	Legal Memoranda and Opinions including subject matter files	8 Years after the close of matter
4.	Litigation files	8 Year after close of the Litigations
4. Property Records		
1.	Original Purchase and Sale Agreement	Permanent
2.	Insurance Documents - Fixed assets, Professional Indemnity and other insurance	Permanent
5. Loan and Securitization documents		
1.	Loan agreements and related documents	8 years
2.	Collateral documents and Reports	8 years
6. Correspondence and Internal Memo		
1.	Those pertaining to non-routine matters or having significant lasting consequences	Permanent
2.	Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. <ul style="list-style-type: none"> • Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; • Letters of general enquiry and replies that complete cycle of correspondence; • Letter of compliant requesting specific actions 	8 years

	<p>that have no further value after change of name or address;</p> <ul style="list-style-type: none"> • Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary. 	
7. Insurance Records		
1.	Insurance Policies	Permanent
2.	Claims records	Till settlement is over and claim money is received
3.	Group Insurance Plans	Until plan is amended or terminated
8. Human Resource Records		
1.	Employee welcome kits	Permanent
2.	Monthly wage registers	Permanent
3.	Monthly PF/ESI/LWF/PT paid receipts	Permanent
4.	Labor renewal certificates	Permanent
5.	NOCs and Full & Final Settlement data	Permanent
9. Secretarial Records		
1.	The memorandum and articles of the company	Permanent
2.	Certificate of incorporation, commencement of business, listing agreement	Permanent
3.	Register of members	Permanent
4.	Books and Documents relating to the issue of share certificates, including the blank forms of share certificates	Permanent
5.	Annual return	Permanent
6.	Shareholding Pattern	Permanent
7.	Quarterly Financial Results	Permanent
8.	Annual Financial Results	Permanent

9.	Annual Report	Permanent
10.	Voting Results by Shareholders	Permanent
11.	Draft Scheme of Arrangement	Permanent
12.	Yearly Disclosure of shareholding of Promoters	Permanent
13.	Minutes book of general meeting	Permanent
14.	Minutes of Board and Committee meeting	Permanent
15.	ROC Filings and Stock Exchange filings in physical and Electronic form	Permanent
16.	Statement under Grievance Redressal Mechanism	8 years
17.	Corporate Governance Report	8 years
18.	Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI	8 years
19.	Listing Fees	8 years
20.	Intimation of appointment of Share Transfer Agent	8 years
21.	In-principle approval prior to issue of securities	8 years
22.	Prior Intimations of Board Meeting for financial Result	8 years
23.	Reconciliation of Share Capital Audit Report	8 years
10. Compliance Records (DP, Exchange)		
1.	Approval Letters	Permanent
2.	Status Reports	Permanent
3.	Copy of Applications	Permanent
4.	Inspection Reports and reply	Permanent
5.	Penalty Reports	Permanent
6.	Reply to the query from exchange	Permanent
7.	Exchange Invoices	Permanent

8.	Copy of NISM Certificates	Permanent
9.	Alert Reports	Permanent
10.	Name change applications	Permanent
11.	Change in control application	Permanent
12.	Branch Inspection Reports	Permanent
13.	Employee Trading confirmation	Permanent
14.	Concurrent Audit Reports	Permanent
15.	Insurance Certificates	Permanent
16.	Application for SEBI registration	Permanent

ANNEXURE II

FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED/DESTROYED

Sl. No	Particulars of Document	Applicable Law	Electronic/ Physical	Signatures	
				Officer	Department Head
1.					
2.					
3.					
4.					
5.					