



## 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.

## **POLICY FOR PRESERVATION OF DOCUMENTS & ARCHIVAL**

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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.