



Sammaan Capital Limited

(Formerly known as Indiabulls Housing Finance Limited)

Preservation of Documents Policy

(Reviewed and Approved by the Board in its meeting held on dated 16.05.2025)

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1. Introduction & Objective

Sammaan Capital Limited (Formerly known as Indiabulls Housing Finance Limited) ("the Company") believes that a good record keeping program is fundamental to the Company's commitment to administrative transparency and accountability. The purpose of Policy on Preservation of Documents is to ensure that necessary records and documents of the Customers and Company are adequately protected and maintained to ensure that records that are no longer needed by the company or are of no value are discarded at regular interval. The Company understands that records form an essential and significant part of the Company's resources.

The major objective of this policy is to determine preservation period for records / documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Company's own information retrieval needs (reference value)
- Statutory requirements under respective statutes
- Litigation requirements
- To ensure easy retrieval
- To ensure that unwanted records do not occupy storage space

2. Target audience

The members of the Board, Treasury Department, Finance Department, Taxation Department, Secretarial Department and Operations Department shall be the primary audience for this document. A copy of this policy shall be posted on the web-site of the Company.

3. Applicability & Validity of the Policy

This Policy on Preservation of Documents shall be approved by the Board of Directors of the Company and shall be effective from the approved date to ensure compliance with RBI guidelines, SEBI regulations and PMLA provisions as applicable to the Company from time to time. The provisions of the Policy shall be applicable to all subsidiaries (including registered NBFCs) of the Company.

The policy needs to be updated periodically, at least on annual basis. Any change in policy by way of additions and amendments due to changes in laws, regulations, accounting standards, shall be implemented immediately with a report to Board of Directors subsequently.

4. Regulatory & Statutory Reference

The Securities Exchange Board of India (SEBI) on September 2, 2015, has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations, 2015). Regulation 9 requires the Company to frame and adopt a policy on preservation of documents.

Prevention of Money-laundering (Maintenance of Records of the Nature and Value of Transactions, the Procedure and Manner of Maintaining and Time for Furnishing Information

and Verification and Maintenance of Records of the Identity of the Clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005 (hereinafter referred as "PMLA") also provides for retention of records for a specified time.

RBI guidelines wide circular RBI/2011-12/25 DNBS (PD) CC No.231/03.10.42/2011-12 dated July, 2011 SCL shall take appropriate steps to evolve a system for proper maintenance and preservation of account information, transactions and records in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities.

5. Record Maintenance

This policy sets the standards for managing, storing and preservation of documents ("Documents shall mean all papers, records, files, books, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.") of the Company broadly classified in the following two categories:

- A. The documents of a permanent nature shall be maintained and preserved permanently by the Company as stated in the Annexures subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.
- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions shall be preserved by the Company for the term stated in the Annexures subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than the term specified in the Annexures. Provided further that the Company may keep the documents as specified above in an electronic mode.
- C. The documents to be maintained and preserved for a specified period of time or of completion of loan tenure are returned back to the customers. However, these shall be preserved by the company for the terms stated in the Annexures.

Further, certain records are maintained / retained in compliance with the Provisions of Rule 3 of PMLA, for a period as specified in PMLA from the date of the closure of the account between the Client and the Company.

6. Destruction of Documents

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under

the charge of each of them. These procedures shall be carried out in terms of this policy as mentioned in SEBI regulations / PMLA Act, NHB and RBI directives as well as Companies Act.

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the Department Head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate / unimportant / irrelevant. This applies to both Physical and Electronic Documents / records. Destruction of documents can be undertaken periodically with the approval of Head of the department concerned. A list of document and date of destruction of such destructed documents have to be maintained by the department.

7. Abbreviations

| Abbreviations | Details |
|---------------|------------------------------------------|
| CEO | Chief Executive officer |
| CFO | Chief Financial Officer |
| COO | Chief Operating Officer |
| DMD | Deputy Managing Director |
| SCL | Sammaan Capital Limited |
| NBFC | Non-Banking Financial Company |
| PMLA | Prevention of Money Laundering Act, 2002 |
| RBI | Reserve Bank of India |
| RBI | Reserve Bank of India |
| SEBI | Securities and Exchange Board of India |
| NHB | National Housing Bank |

8. Annexures

ANNEXURE 1

| Sr. No | Record Category | Record Type | Minimum Retention Requirement |
|--------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Board Meeting and Committee Meeting Records | 1. Agenda 2. Internal Audit Reports 3. Board Resolutions 4. Committee Resolutions 5. Board Minutes 6. Committee Minutes 7. Adopted Policies/ codes etc. 8. Attendance Registers. | Permanent |
| 2 | General Meeting Records | 1. Registers and Index of Members. 2. Minutes 3. Attendance Registers | Permanent |
| 3 | Other Secretarial Records | 1. Certificate of incorporation/ conversion/ business commencement/ change in object clause 2. Memorandum and Articles of Association. 3. Common seal. 4. Annual Reports 5. Statutory Registers under Companies Act, 2013 6. Share Transfer, transmission, correspondence with Registrar and Share Transfer Agent. 7. Correspondence with Statutory Bodies. | Permanent |
| | | 8. Non- Statutory Registers under the Companies Act, 2013 9. Correspondence with Security holders. 10. Copies of Annual Returns along with certificates and documents annexed thereto | 8 years from the financial year in which the latest entry is made. 8 years from the date of compliant resolved. Not less than 10 years from the date of filing with Registrar. |

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| 4 | Contracts/ Agreements/ purchase orders | 1. Renewal 2. Modification /addendums 3. Termination. 4. Notices. Etc. | 10 years from date of date of termination of contracts or closure of the issue, if any |
| 5 | SEBI & Stock Exchange Records | 1. Correspondence with Statutory bodies 2. Quarterly/ Half yearly/ Annually/ Other compliances submitted from time to time 3. Listing Agreement 4. Disclosures in newspapers 5. Statutory Returns/ Reports submitted from time to time. | Permanent |
| | | 6. Audio recordings, video recordings (if any) and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means | 8 years after completion of the transaction |
| 6 | Audit Reports | 1. Concurrent Audit Reports 2. Correspondence with statutory bodies. 3. Auditors report. 4. Disclosure in newspaper | 8 financial years following the relevant financial year |
| 7 | Miscellaneous Licenses obtained from the statutory authorities | 1. Various Certificates, licenses, approvals, etc. | Permanent |
| 8 | Legal & Compliance Records | 1. Legal Memoranda and Opinions (including all subject matter files) | 10 years after closure of matter |
| | | 2. Arbitration and Litigation Files | 10 years after the award/judgment becomes final in all respects by limitation or final decision in appeal/ revision |
| | | 3. Court Orders | Permanent |
| | | 4. Equitable Mortgage Register | Permanent |
| | | 5. Legal Contracts | 10 years after termination |

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|----|--------------------|-----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | 6. Legal Correspondence | 10 years from closure of the Matter. |
| | | 7. Files, papers and documents relating to contracts, agreements etc. | 10 years after the contract/ agreement is fulfilled or terminated. In cases where audit objections have been raised, however, the relevant files and documents shall not, under any circumstances, be allowed to be destroyed till such time as the objections have been cleared to the satisfaction of the audit authorities |
| | | 8. All confidential Agreements of Non-Disclosure nature | Permanent |
| | | 9. Registration Certificates | Permanent |
| | | 10. Correspondences with the Regulators | 10 years |
| 9 | Personnel Records | 1. Official Personnel files of Active Employees. | To be retained for 10 years |
| | | 2. Official Personnel files of Inactive Employees | 10 years from the date of termination of employment |
| 10 | Labour Law records | 1. Registration/ Renewal Certificate under Various Acts relating to Labour Laws. | Permanent |
| | | 2. Maintenance of various registers under the various acts in force read with the Rules made thereunder, relating to Labour Laws. | |
| | | 3. Provident Fund Records | 10 years |
| | | 4. ESIC Records | 5 years |
| | | 5. Professional Tax Records | 8 years |
| | | 6. Labour Welfare Fund Records | 5 years |

ANNEXURE 2 (CUSTOMER DOCUMENTS)

| Sr. No | Record Category | Record type | Retention period |
|--------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| 1 | KYC Documents | 1. Rejected Loan applicant's KYC documents. | 1 year from the date of rejection. |
| | | 2. KYC documents of loan account holders | 10 years from the date of closure of the account. |
| | | 3. Audit trail of transactions of all accounts/documents, ledgers and record of transactions on the basis of which CTR, STR or CRR have been filed with FIU | 15 years after the filing of the report or till the disposal of court cases, if any, filed based on the report. |
| 2 | Legal & Compliance Records | Rejected cases- documents including correspondence with Clients and duly signed application forms received from Client | 1 year from the date of rejection |
| | | Loan sanction documents including correspondence with Clients and duly signed application forms received from Client | At least 10 years after termination |
| 3 | Property Records | Agreements/ contracts Documents relating to acquisition and sale of Real property | Loan Closure |
| 4 | Insurance Records | Insurance policy execution/ renewal certificate. Insurance claims under various policies. | 10 years from the lapse of policy/ settlement of claim. |

ANNEXURE 3 (ACCOUNTING & FINANCE)

| Sr. No | Record type | Retention period |
|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 1 | Financial statements consisting of a balance sheet as at the end of the financial year, a profit and loss, Cash flow statement, a statement of changes in equity, explanatory notes to financial statements. | Permanent |
| 2 | All sales and purchase of goods and services by ICCL | Preserve for a period of at least 8 Financial Years. |
| 3 | The assets and Liabilities of ICCL | |
| 4 | All sums of money received and expended by SCL and matters in relation to which the receipt and expenditure take place | |
| 5 | Vouchers. | |
| 6 | Records relating to branch mentioned in point 1 and 2 shall be maintained at branch. | |
| 7 | Ledgers, day-books, cash books, account-books and other books, whether kept in the written form or as print-outs of data stored in a floppy, disc, tape or any other form of electro-magnetic data storage device | Preserve for a period not less than 1 years |
| 8 | All record pertaining to or evidencing all cash transactions of the value of more than rupees ten lakhs or its equivalent in foreign currency | 5 years from date of transaction |
| 9 | All record pertaining to or evidencing all series of cash transactions integrally connected to each other which have been individually valued below rupees ten lakhs or its equivalent in foreign currency where such series of transactions have taken place within a month and the monthly aggregate exceeds Rs.10 lakh | |
| 10 | All record pertaining to or evidencing all cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine or where any forgery of a valuable security or a document has taken place facilitating the transactions | |
| 11 | All record pertaining to or evidencing all suspicious transactions whether or not made in cash. | |
| 12 | All record pertaining to or evidencing all cross border wire transfers of the value exceeding Rs.5 lakh or its equivalent in foreign currency where either the origin or destination of fund is in India | |

ANNEXURE 4 (TAXATION RECORDS)

| Sr. No | Record Type | Retention period |
|---------------|--------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| 1 | Tax-Exemption Documents and Related Correspondence | Permanent |
| 2 | Tax Returns and Payments of Tax proofs | Permanent |
| 3 | Tax Work papers – Originals | 8 years. In case of Transfer pricing being applicable for the period of 10 years. |
| 4 | Service Tax Documents/ Books of Accounts- All vendor invoices in which Service Tax input is claimed are to be preserved. | 7 years from date of such invoice. |

ANNEXURE 5 (TREASURY RECORDS)

| Sr. No | Record Type | Retention period |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Borrowing Documents | |
| | Bank/FI Loan Agreements Sanction letters important lenders communications Debenture term sheets Debenture Application forms Commercial paper documents supporting resolution copies Securitization documents Other Documents pertaining to loan including rating (excluding securitization) | 8 years 8 years 8 years Permanent Permanent 8 years 8 years 8 years post survival of transactions As per the regulatory requirements |
| 2 | Bank Accounts Documents | |
| | Bank account details Signature cards and KYC documents of signatories Authority Letter | 8 years & regular updates |
| 3 | MIS / Reports | |
| | Interest data Cost of Funds Data MIS on borrowing MIS on Investments MIS for Daily, Weekly, Monthly, Quarterly reports CMA details ALCO | 8 years |
| 4 | Investments | |
| | Investment and Redemption slip FD copies / confirmation | 8 years |

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| | FD Registers BG Registers Mutual Fund statements / confirmations Mutual Fund Register | |
| 5 | Other Parties documents | |
| | Trustee related documents Trust Deed IPA documents Trustee Agreements | Permanent |