



VEDIKA CREDIT CAPITAL LTD
PARTNER IN THE GROWTH OF MICRO ENTREPRENEURS

2022

PRESERVATION OF DOCUMENTS POLICY

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PREAMBLE

SEBI has through its circular, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) has imposed certain obligations and disclosure requirements on all listed entities. Pursuant to Regulation 9 of Chapter III of the said circular all listed entities are required to formulate and put in place a policy for preservation of documents.

The Board of Directors (Board) of Vedika Credit Capital Ltd (“the Company” or “VCCL”) has adopted the following policy and procedure with regard to preservation of documents as defined below. The Board will review and may amend this policy from time to time.

INTRODUCTION

A document preservation policy involves the systematic identification, categorization, maintenance, review, retention, and destruction of documents including electronic documents received or created in the course of business.

The policy contains the guidelines 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 should be accessed or retrieved when they are needed as per the rules made under the law.

DEFINITIONS

“Act” means the Companies Act, 2013.

“Authorized Person” means any person authorized by the Board.

“Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

”Company” means Vedika Credit Capital Ltd or "the Company" or "VCCL"

“Documents” means all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force. “Board” means the Board of directors of the Vedika Credit Capital Ltd or its Committee.

“Listing Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

“SS-1” Means Secretarial Standard-1 for the Board Meetings as notified by the ICSI “SS-2” Means Secretarial Standard-2 for the General Meeting as notified by the ICSI

"Compliance officer" Compliance Officer: The Company Secretary and/or a Key Managerial Person appointed by the Board of Directors of the Company as the Compliance Officer for the purpose of these regulations from time to time.

Note: - The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

COVERAGE

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

PURPOSE

This policy sets the standards for managing, storing and preservation of documents of the Company.

CLASSIFICATION

- Document that needs to be preserved permanently.
- Document that may be preserved/ retained for a period of 8 years after completion of the relevant transaction.
- Documents to be preserved electronically.

ADMINISTRATION

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is given in the annexure.

SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the company or commencement of any litigation against the company, such employee shall inform the top management, and any further disposal of documents shall be suspended until such time as the top management with the due advice from the legal counsel determine otherwise. The top management in such case shall inform all the employees by mail under "User list" of the need to retain the documents and suspension of disposal of the same.

MODES OF PRESERVATION

The document may be preserved in Physical form and Electronic Form.

The officer of the company required to preserve the document shall be Authorized Person who is generally expected to observe the compliance of requirement of Applicable laws.

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.

PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing

responsibility on the Company's employees would immensely help Company's litigation preparedness tool helping the Company's and Outside legal counsel to track down documents to handle the legal cases.

RECORD RETENTION SCHEDULE

Records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use, therefore disposal will aid efficiency. The records referred in Appendix shall be preserved as mentioned therein and thereafter as per the discretion of the Board/committee, records may be disposed of in the manner prescribed by it. The Company shall maintain a record of preservation and disposal of records wherein the brief particulars of the records preserved and/or removed from the location after the expiry of its preservation period shall be entered.

LIST OF RECORDS

Accounting and Financial records including Annual Financial statement (Department Responsible – Finance & Accounts)

S. No.	Record Type	Retention Period
1	Accounts Payable ledgers and schedules	8 years
2	Accounts Receivable ledgers and schedules	8 years
3	Annual Audit Reports and Financial Statements	Permanent
4	Annual Audit Records, including work papers and other documents that related to the audit	8 years form date of completion of audit
5	Bank Statement and Cancelled Cheques	Permanent
6	General Ledger	Permanent
7	Interim Financial Statements	Permanent
8	Investment Records	Permanent

Insurance records (Department Responsible – HR)

S. No.	Record Type	Retention Period
1	Group Insurance Plans – Active Employees	8 years
2	Group Insurance Plans – Retirees	Permanent
3	Insurance Policies for the Company	Permanent

Taxation Related (Department Responsible – Finance & Accounts)

S. No.	Record Type	Retention Period
1	Tax Bills, Receipts, Statements	Permanent
2	Tax Returns	Permanent
3	Tax computation details	Permanent
4	Sales Tax Records	Permanent
5	Annual Information Returns – Income Tax	Permanent



6	Service Tax Records	Permanent
7	GST Returns & Records	Permanent

Contracts entered into by the Company (Department Responsible – Legal / Business Development & Planning /Respective Departments)

S. No.	Record Type	Retention Period
1	Contracts and Related Correspondence (Including any proposal that resulted in the contract and all other supportive documents)	8 Years from the date of termination/expiry of such agreement
2	Loan Documents including Customer KYCs & Other Related Documents	8 Years from the date of termination/expiry of such agreement

Records including Certificate of Incorporation, Listing Agreement and approvals from statutory authorities (Department Responsible – Compliance)

S. No.	Record Type	Retention Period
1	Certificate of incorporation	Permanent
2	Memorandum / Articles of Association	Permanent
3	Listing Agreement	Permanent
4	Common Seal	Permanent
5	Minutes of meetings of Board/ Board Committees	Permanent
6	Annual Reports	Permanent
7	ROC Filings and Stock Exchange filings in physical and electronic form	Permanent
8	Record of Private Placement (PAS-5)	Permanent
9	Register of Duplicate and Renewed Share Certificate	Permanent
10	Register of Transfers / Transmission of Shares	Permanent
11	Register of Directors & KMP	Permanent
12	Register of Members	Permanent
13	Other Statutory Register	As Specified

Legal Files and Records (Department Responsible – Legal)

S. No.	Record Type	Retention Period
1	Legal Memoranda and Opinions of the matter	8 years after the closure
2	Litigation files finality of the case(s)	8 years after attaining
3	Court Orders other than in recovery suits	Permanent

Property Records (Department Responsible – HR)

S. No.	Record Type	Retention Period
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1	Lease Agreements & Property Related Deed & Agreements	8 years after expiration/ determination of the lease provided there is no dispute/ claim/litigation is pending. If any such dispute persists, it should be preserved till the dispute is settled/closed
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Payroll Records (Department Responsible – HR)

S. No.	Record Type	Retention Period
1	Employee Deduction Authorization	8 years after termination of service of employment
2	Payroll Deductions	8 years after termination of service of employment
3	Labor Distribution Cost Records including details regarding gratuity and retiral Disbursements	8 years after termination of service of employment
4	Payroll Registers (Gross and Net)	8 years after termination of service of employment
5	Time Cards / Sheets	8 years
6	Unclaimed Wage Records	8 years
7	Leave Records	8 years after the relevant period
8	Attendance Records	8 years

Pension and retiral related Records (Department Responsible – HR)

S. No.	Record Type	Retention Period
1	Retirement and Pension Records	Permanent

Personnel and HR Records (Department Responsible – HR)

S. No.	Record Type	Retention Period
1	Personnel files of individual employees	Permanent
2	Commission / Bonuses / Incentives/ Awards	8 years
3	Employee Earnings Records	8 years after termination of service of employment
4	Employee Handbook & Induction Manual	Permanent
5	Employee Medical Records	8 years after termination of service of employment
6	Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry, related papers	8 years after termination of service of employment



7	Employment Contracts - Individual	8 years after termination of service of employment
8	Correspondence with Employment Agencies and Advertisements for job openings	8 years
9	Job Description	8 years after termination of service of employment

Programs & Service Records (Department Responsible – HR)

S. No.	Record Type	Retention Period
1	Attendance Records	8 years
2	Program statistics, etc.	8 years
3	Research & Publications	Permanent

Corporate Social Responsibility (CSR) Records (Department Responsible – Compliance)

S. No.	Record Type	Retention Period
1	Records on CSR Projects (including amount budgeted, spent and balance if any), projects undertaken and progress thereon	Permanent

Electronic Documents including e-mail retention and back-up (Department Responsible – Information Technology)

S. No.	Record Type
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Electronic Mail E-mails need to be retained only depending on the subject matter: -

1

- All e-mail from internal and external sources to be deleted after 24 months.
- Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.
- The Information Technology department would archive e-mail for six months after the staff has deleted it. Thereafter the email will be permanently deleted.
- Staff will not store or transfer the e-mails related to the Company on non-work-related computers except as necessary or appropriate with due approvals from the Information Technology department and the respective managers.
- Staff will take care not to send confidential / proprietary information to outside sources.
- Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employees'



workplace.

Electronic Documents including PDF files.

- 2
 - PDF documents – Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end.
 - Text/ Formatted files: All word / excel / Power point files may be deleted once every year depending on the importance or lack of it.

Web page files: -

- 3
 - May be retained for a period of 5 years as specified in SEBI LODR Regulations, 2015.
 - May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page.

Miscellaneous Policies (Department Responsible – Compliance/Concerned Department)

S. No.	Record Type	Retention Period
1	Policy and procedures manuals – Original	Permanent
2	Policies and procedures manuals - Copies	Permanent
3	Dealership agreements	Permanent

Secretarial Records prescribed under the Companies Act, 2013 (Department Responsible – Compliance/Concerned Department)- (Permanent)

- Memorandum & Article of Association of the Company
- Minutes of General Meetings, Board & Committee meetings
- Register of members & Index
- Foreign Register of Members
- Register of Charges
- Register of renewed and duplicate share certificate
- Register of Loans, guarantee, Securities and acquisition made by the Company
- Registers of Investments not held by Company in its own name
- Registers of contract with related party, contracts & bodies etc. in which Directors are interested.
- Registers of Directors and KMPs
- Intellectual Property documents (Others)

- Certificate of incorporation
- Certificate for commencement of business
- Agreements made by the Company with Stock Exchanges, Depositories, etc.
- Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases
- Compliance Reports received from any statutory authority
- Correspondences made with any statutory authority
- Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger /Register
- Authorization / licenses obtained from any statutory authority
- Policies of the Company framed under various regulations
- Register of preservation and disposal of records
- Register of Power of attorneys, if any
- Certificates obtained from various statutory authorities
- Forms and returns filed with any statutory authority

Secretarial Records prescribed under the Companies Act, 2013- Department Responsible – Compliance/Concerned Department)- (Secretarial Records to be maintained for the period of 8 years)

- Registers of Debenture holders.
- Copies of annual returns
- Disclosure of Interest received from the Directors
- Changes to Memorandum & Article of Association
- Attendance Registers, Notice, Agenda and other related papers.
- Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
- Register of Inter Corporate Loans and Investments as per Companies Act, 2013
- Register of Deposits as per Companies Act, 2013

- Register of Allotment (from the date of each allotment) as per Companies Act, 2013
- Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
- Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
- Copy of newspaper advertisement or publications
- All agreement entered into by the Company from the date of its termination
- All show cause notice or any other notice received from any statutory authority, government departments, Judicial or Quasi-judicial authority etc.

DISPOSAL OF DOCUMENTS

Destruction of the above registers and documents shall be done after the preservation period with the approval of Managing Director and in the presence of Compliance Officer and necessary record will be kept for that purpose.

Note: -

1. Wherever the specific period of preservation is mentioned in the Act/Rules/Secretarial Standards, the same be adopted from time to time.
2. Wherever the specific period of preservation is not mentioned in this policy or in the Act/Rules/Secretarial Standards, CMD is authorized to decide from time to time the preservation period and the person under whose custody the documents should be kept.

PERIODICAL REVIEW OF THE POLICY

The Policy is flexible and easy to understand and comply with by all levels of employees. The Board should review this Policy periodically but at least once in a year, so that it remains appropriate in the light of material changes in regulatory requirement with respect to the Company's size, complexity, geographic reach, business strategy, market and best governance practices.

The policy can also be reviewed as and when deemed necessary by the Top Management and amendments effected to the same, subject to approval of the Board if any, and when practical difficulties are encountered. The Top management may also review the policy on document retention to comply with any local, state, central legislation that may be broadcast from time to time

AMENDEMENT OF THE POLICY

The Board of Directors on its own and/or on the recommendation of the top management can amend this policy as and when required deemed fit. Any or all provisions of this Policy would be subjected to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.