



ASSET RECONSTRUCTION COMPANY (INDIA)

LIMITED

ASSET RECONSTRUCTION COMPANY (INDIA) LIMITED

DOCUMENT PRESERVATION & ARCHIVAL POLICY

(Approved in Board Meeting held on June 14, 2025)

Process & Admin Group

Document Preservation & Archival Policy

1. Background

Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**") refers to an archival policy as per which, all events or information which has been disclosed to stock exchange(s) under Regulation 30 of the Listing Regulations shall be hosted on the website of Asset Reconstruction Company (India) Limited (the "**Company**") for a minimum period of five years and thereafter as per the archival policy of the Company, which will be disclosed on its website i.e. <https://www.arcil.co.in/>.

The Company is required to maintain certain types of corporate records for a specified period of time under applicable corporate/ securities laws, including but not limited to the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 and the Companies Act, 2013 ("**Applicable Laws**"). There are certain types of records that need to be retained for a specified period of time, as identified below.

- a) **Documents to be preserved permanently:** The documents listed in *Schedule I* along with any other documents required legally shall be maintained and preserved permanently by the Company.
- b) **Documents to be preserved for no less than eight (8) years:** The documents listed in *Schedule II* along with any other documents required legally shall be maintained and preserved for no less than eight (8) years by the Company.
- c) **Documents to be preserved for no less than five (5) years:** Records maintained under Prevention of Money Laundering Act and rules made there under read with KYC Master Directions and other applicable RBI circulars in respect thereof as listed in *Schedule III* shall be preserved and maintained for a period of five years from the date of its event, unless specified under the any other Act or Rules, for longer duration.
- d) Records required to be maintained under the Income-tax and Goods and Service tax Law specified in *Schedule IV*
- e) Records required to be maintained on website of the Company is specified under Listing Regulations. Please refer to *Schedule V*.

Records may be preserved for longer periods of time where required under any other Applicable Laws.

Similarly, if an employee believes, or the Company requires that, Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise. The senior management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time.

The document retention shall also take into account the requirements for business continuity plan (BCP) in place from time to time.

2. Purpose

The purpose of this document is to formulate a policy for archival of the disclosures made on the website for information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations.

3. Definitions

"Applicable laws" means securities laws defined under Regulation 30(8) of the Listing Regulations and other laws and statutes applicable to the Company, mandating preservation of documents.

"Board" means board of directors of the Company as constituted from time to time.

"Company" means Asset Reconstruction Company (India) Limited.

"Company Secretary and Compliance Officer" means the company secretary and compliance officer appointed by the Board.

"Document/s" includes all papers, documents, agreements, filings, forms, memos, correspondences, records, files, books, etc., of the Company in physical or electronic forms.

"Key Managerial Personnel" means:

- i. Chief Executive Officer or the Managing Director or the Manager;
- ii. Whole-time Director;
- iii. Company Secretary;
- iv. Chief Financial Officer and
- v. such other officer as may be prescribed by the Act and SEBI Listing Regulations from time to time.

"Managing Director" means the managing director appointed by the Board and the shareholders of the Company.

"Policy" means this policy on archival of the disclosures made for on the website for information and events communicated to stock exchanges formulated by the Company.

4. Archival Process

- i. All the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations will be hosted on the website of the Company under the section entitled "*Investor Relations*" for a period of five years and thereafter the same shall be archived so as to be available for retrieval for such period as may be decided by the Chief Executive Office and Managing Director of the Company.

- ii. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company.
- iii. This policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.

5. Mode of Preservation

The documents may be preserved in physical or electronic form. Insofar as practical and possible, after taking into consideration the legislative and regulatory requirement, the documents shall be preserved in electronic form.

The Functional Heads of the Company or delegate(s) one level below the Functional Head required to preserve the documents shall be the Authorized Person for that Function/Department who is generally expected to observe the compliance of preservation of Documents as per the requirements of Applicable law.

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.

6. Place of Storage

- The Company shall identify and have an approved place of storage to maintain all records safely.
- The selected location must be secure and fireproof.
- A well-defined list of repositories for all documents archived with information on its physical/electronic location should be maintained.
- The Company may outsource its document storage activity; however, this must be done after carrying out due diligence and verification.
- Company shall enter into arrangements with the outsourced vendors/agencies after entering into an appropriate agreement.

7. Access to the Documents

The preserved documents must be accessible at all reasonable times. Access may be controlled by Authorized Person from each respective functions/department, so as to ensure integrity of the documents and prohibit unauthorized access.

Functional Heads of the respective departments shall be responsible for ensuring compliance of this Policy, as related to access control of the documents and records.

8. Custody of Documents

The custody of the documents shall be with the Authorized Person. In case the Authorized Person tenders resignation such person shall hand over all the relevant documents, lock and key, access control or password of intranet drives, or CD

ROMs/USB storage drives, other storage devices or such other documents and devices in his possession under the Policy.

Functional Heads of the respective departments, shall be responsible for ensuring compliance of this Policy, as related to records in their possession, custody, or control.

9. Digitization of Physical Records

The physical documents preserved may be converted, whenever required or deemed necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

Physical records may be digitized as per following category:

- Physical records to be preserved permanently
- Records of secondary importance and have a reference value for a limited period – 11 years or as may be applicable.
- Physical Documents once digitized, may be destroyed, provided, record keeping of those documents are not mandated by law.
- Respective departments will take ownership of the proper digitization of physical records, when physical records are converted into electronic form. Digitization of Physical record and destruction of such physical record will be done as per this Policy.

10. Destruction of Documents

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 Functional Head of the department concerned. A list of document and date of destruction of such destructed documents have to be maintained in the Departments.

The documents may be destroyed as follows:

- Recycle non-confidential paper records.
- Shred or otherwise render unreadable confidential paper records.
- Delete or destroy electronically stored data. The Company will have in place appropriate controls over the destruction of records upon expiry of the period set out in the policy statement. Such controls will include:
 - o Authorization and approval prior to destruction.
 - o Establish procedures for destruction of physical documents/records (whether in-house or outsourced).
 - o Electronic media as per the Company's Information Security policy.

11. Authenticity of Documents

Where a document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

12. Review and Amendment of the Policy

The Policy may be amended or substituted by the Board as and when required or when there are statutory or regulatory changes necessitating the change in the Policy. This Policy shall be reviewed by the Board on the recommendation of Audit Committee on an annual basis. Any deviation from the policy shall be approved by the Board of Directors.

13. Limitation

In the event of any conflict between the provisions of this Policy and of the Applicable Laws, the provisions of Applicable Laws shall prevail over this Policy.

Schedule I**Documents whose preservation shall be permanent in nature.**

Sr No.	Document
1.	Incorporation documents
2.	Memorandum and articles of association
3.	Register of members along with the index
4.	Register of renewed and duplicate share certificates
5.	Register of charges
6.	Register of loans, guarantees, security and acquisition
7.	Register of investments made by the Company not held in its name
8.	Register of contracts or arrangements in which directors are interested
9.	Foreign register of members
10.	Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board of Directors, creditors, committees of the Board of Directors and resolutions passed by circulation
11.	Other including Income & Other taxes: <ul style="list-style-type: none"> i. Legal opinions and Memorandum (including all subject matter files) ii. Litigation Files iii. Court Orders iv. Correspondence with any statutory authority v. Income Tax Returns and Acknowledgements vi. Submission to Tax Offices vii. Assessment orders and appeal papers o Evidence of payment of taxes viii. Annual Information Reports

Schedule II**Documents with preservation period of not less than eight years after completion of relevant transaction**

Sr. No.	Document
	Under Companies Act, 2013
1.	Books of account including relevant books and papers and financial statements
2.	Compliance Reports issued by Statutory and/ or Secretarial Auditor
3.	Disclosures/ notices by a director of his interest
4.	Register of deposits
5.	Instrument creating a charge or modification
6.	Annual return and copies of all certificates and documents required to be annexed thereto
7.	Register of debenture holders and Debentures Trust Deed from the date of its redemption.
8.	The attendance register of Board & Committee Meetings
9.	Register of Buy Back of Securities from the date of completion of buy-back.
10.	Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots.
11.	Register of Transfer and Transmission of shares/Debentures and other securities
12.	Scrutinizer's Report on Postal Ballot, if any, and AGM.
13.	Documents relating to appointment of Managerial Personal.
14.	Dividend reconciliation statement till the time the dividend is transferred to IEPF.
15.	Others – Including INCOME TAX & OTHER TAXES <ol style="list-style-type: none"> Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, training and qualification records Employee Payroll and deductions records Payroll Tax records VAT records – Invoices and set off claims

Schedule III**Documents to be preserved for no less than five (5) years:**

Sr. No.	Document
1.	All record pertaining to or evidencing all cash transactions of the value of more than rupees ten lakhs or its equivalent in foreign currency;
2.	b. 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;
3.	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;
4.	All record pertaining to or evidencing all suspicious transactions whether or not made in cash.
5.	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
6.	All record pertaining to or evidencing all purchase and sale of immovable property valued at Rs.50 lakh or more that is registered by the reporting entity.
7.	The audio recordings and the video recordings shall be hosted on the website of the listed entity for a minimum period of two years.
8.	The transcripts of shall be hosted on the website of the listed entity for a minimum period of five years.

Schedule IV

Records required to be maintained under the Income-tax and Goods and Service tax Law

All information / details / back up documents relating to the financial statements of 11 financial years (including current financial year) is required to be maintained. Further, there is no monetary limit for maintaining such details / particulars for taxation purposes and hence all data will be required to be maintained for the stated number of years.

Schedule V

Documents which are to be maintained on website of the Company for a minimum period of five (5) years:

- a. Disclosure of all events and information provided to the Stock Exchanges as per the Listing Regulations
- b. Investor Presentation and audio video recordings/transcripts of investor calls
- c. Press Release.

The above documents as uploaded on the Company's website will be archived for a period of three (3) years and thereby destroyed as per this Policy.