

POLICY FOR PRESERVATION OF DOCUMENTS

FOR

PB FINTECH LIMITED

**(FORMERLY “PB FINTECH PRIVATE LIMITED / ETECHACES MARKETING AND
CONSULTING PRIVATE LIMITED”)**

Document Control:

Type Of Information	Document Data
Document Title	Policy for Preservation of Documents
Document Code	PB Fintech V1.0
Date of Release	19-Oct-2021
Document Version No.	1.0
Department of Record	Secretarial
Document Author(s)	Anand Kumar Pandey
Document Reviewer	Bhasker Joshi
Security Classification	Internal
Document Status	Final
Date of approval /amendment	October 19, 2021

Document Revision History:

Ver. No.	Date	Change Description	Author	Reviewed by	Approved By
1.0	19-Oct-2021	Initial Release	Anand Kumar Pandey – Secretarial	Bhasker Joshi – Company Secretary	Board of Directors – PB Fintech Limited

Policy for Preservation of Documents

1. Preface

The Board of Directors (the “Board”) of PB Fintech Limited (formerly known as PB Fintech Private Limited / Etechaces Marketing and Consulting Private Limited) (the “Company”) has approved the following Policy (“The Policy”) of the Company for preservation of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”) at its meeting held on October 19, 2021 and is also applicable to its subsidiaries. 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), classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions.

Besides the above, as per applicable provisions of Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

2. Purpose of the Policy

The purpose of this Policy is to ensure that the 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 is also for the purpose of aiding 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 instant policy has restricted itself to the determination of preservation timelines in respect of the Documents filed from time to time under the provisions of the Listing Regulations.

3. Administration

Attached as Appendix A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy. Any queries regarding the Policy shall be referred to the Administrator, who is in charge of administering, enforcing and updating the Policy.

4. Procedure for disposal of Documents

The Documents of the Company which are no longer required as per the time schedule prescribed in the Appendix A may be destroyed. The Administrator may direct Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix A. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by employees who are disposing of the Documents in the format prescribed at Appendix B.

5. Suspension of Documents disposal in the event of Litigation or Claims

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, than 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.

6. Amendment

Any change in the Policy shall be approved by the Board of the Company or any committee of the Board or any person, as may be authorised by the Board. The Board shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

APPENDIX – A

SCHEDULE A

LIST OF DOCUMENTS TO BE PRESERVED PERMANENTLY

1. Copies of all documents and information as originally filed relating to incorporation of the Company.
2. Minutes of General Meetings/resolutions passed by postal ballot, meeting of Board of Directors, Committees of Board and resolutions passed by circulation.
3. The attendance register of Board & Committee Meetings.
4. Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities).
5. Register u/s 189 of the Companies Act, 2013 (Register of Contracts or arrangements in which directors are interested as per section 184 & 188 of the Act.
6. Register of Renewed and Duplicate Shares.
7. Register of Charges.
8. Registers of Members along with the index.
9. Foreign Register of Members.
10. Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person), if & when applicable.
11. Disclosures received by the company under the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.
12. Record of Directors particulars.
13. Material agreements.
14. Audit reports received from Statutory Auditors/Secretarial Auditors/Internal Auditors.
15. Documents to be filed with Registrar of Companies under Companies Act, 2013/1956.
16. Copy of Memorandum & Articles of Association.
17. Certificates issued by Registrar of Companies, Any court order/NCLT order etc.
18. Annual Reports

SCHEDULE B

LIST OF DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN 8 YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION

1. Books of Accounts & Tax returns along with all supporting documents & vouchers etc.
2. Register of Deposits accepted or renewed, if & when applicable.
3. Instrument creating charge or modification thereon.
4. Register of debenture holders or any other security holders along with the index, if & when applicable.
5. Foreign Register of debenture holders or any other security holders.
6. Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the Company.
7. Office copies of general meeting Notices, scrutinizers report and other related papers of the Company.
8. Any other register /documents required by any law, for the time being in force.
9. Attendance slips for Annual General Meeting/ Extra Ordinary General meeting.
10. Dividend Payment Records.
11. All documents required to be filed with SEBI, Stock Exchanges, Depositories or any other regulatory/governmental authority.

SCHEDULE C

LIST OF DOCUMENTS AVAILABLE ON THE WEBSITE OF THE COMPANY

1. Basic information about the Company including the details of its businesses;
2. All information and/or documents required to be posted on website as specified in the Companies Act, 2013 and/or Regulation 46(2)/Regulation 30 of the SEBI (LODR) Regulations, 2015.
3. All documents required to be filed with Stock Exchanges under aforesaid Regulations.
4. Any changes in the content on the website shall be updated within 2 working days.
5. Schedule of Analyst or Institutional Investor meet and presentations made by the Company to them.
6. The information/documents provided on the website shall be for current financial year & for preceding five financial years.

SCHEDULE D

PARTICULAR OF DOCUMENTS AND DEPARTMENT OF RECORDS

Sl. No.	Particulars of Documents	Department of Records
1.	Certificate of Incorporation	Secretarial
2.	Certificate of commencement of business	Secretarial
3.	Memorandum and Articles of Association	Secretarial
4.	Minute books of general, board and committee meetings	Secretarial
5.	Following registers maintained by the company- i. Register of members and other security holders. ii. Foreign register of members. iii. Register of transfer, transmission of securities iv. Register of renewed and duplicate share certificates v. Register of Director and Key Managerial Personnel vi. Register of Director shareholding vii. Register of contract in which directors are interested viii. Register of charges ix. Register of loans, guarantee and securities x. Register of investments made by the company xi. Register of investments not held in its name by the company xii. Register of documents executed under common seal xiii. Attendance register of the meetings of the board and its committees	Secretarial
6.	Policies, charter and code of the Company	Secretarial
7.	Application for issue and listing of securities	Secretarial
8.	Title documents	Legal
9.	License, documents, approvals etc. received from any government or regulatory authority	Legal
10.	Intellectual property documents	Legal
11.	Orders, Judgments of court or any adjudicating authority	Legal
12.	Notices, agenda and notes on agenda of board and committee meetings	Secretarial
13.	Copies of notices, scrutinizer report and other documents related to shareholder/creditor meetings	Secretarial
14.	Instruments evidencing creation of charges or modification	Secretarial

15.	Annual financial statements	Secretarial
16.	Notice of interest received from the directors or the key managerial personnel	Secretarial
17.	Disclosure under vigil mechanism	Secretarial
18.	Disclosure to be made to the stock exchange under regulation 30 of the listing regulations	Secretarial
19.	Following registers are not to be maintained permanently- i. Register of deposits ii. Register of allotment iii. Register of payment of dividend iv. Register of proxies v. Register of inspection vi. Register of investor complaints vii. Register of sweat equity shares viii. Register of employee stock option ix. Register of postal ballot	Secretarial

SCHEDULE E

List of documents with preservation period other than those mentioned in Schedule A and Schedule B

Sl. No.	Particulars of Documents	Department of Records
1.	Documents governed by the jurisdiction of foreign country	Concerned department to which the document belongs.

Preservation of Documents:

The Documents specified above shall be kept in electronic mode.

