

## **Policy on Preservation of Documents & Archival Policy**

### **Preamble**

The Board of Directors (the "Board") of Quest Financial Services Limited (the "Company") has adopted the following policy with regard to preservation and archival of Documents. This policy deals with the retention and archival of the corporate records in terms of Regulation 9 of the Securities Exchange Board of India ("SEBI") (Listing Obligation and Disclosure Requirements) Regulations, 2015. Further, Regulation 30(8) requires the Company to frame a Policy on website disclosure and archival of such disclosures.

In compliance to the aforesaid regulation, this policy encompasses the manner of archival of the documents which have been disclosed on the website of the Company for the time frame prescribed in various Regulations. This policy can be modified and or amended with the approval of the Board of Directors only.

### **Policy Objectives**

The policy is framed with the major objective of Identification and categorization of statutory registers and other records of the Company which are required to be preserved and maintained either for eight years or permanently and also to aid employees of the Company in understanding their obligations in retaining and preserving the documents and records.

### **Definitions**

"Company" means Quest Financial Services Limited.

"Act" means Companies Act, 2013 and rules thereunder.

"Board" means Board of Directors of the Company.

'Applicable Law' means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the Documents has been prescribed.

'Regulations' mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 including and any amendment thereto.

'Records / Documents' includes and contains all relevant information relating to the Company and necessary documentations required to be maintained under the Applicable Law.

'Archive/archiving' is transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information.

'Policy' means this Policy on Preservation of documents and Archival Policy.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the Regulations or any other applicable law or regulation to the extent applicable to the Company.

## **Policy**

### **Preservation of Documents**

1. Documents whose preservation shall be permanent in nature:

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is listed in **Annexure–A**.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

2. Documents whose preservation shall be for a period of not less than eight years after completion of the relevant transactions:

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years after completion of the relevant transactions shall be preserved accordingly. Detail of documents with preservation period of not less than eight years after completion of the relevant transactions is listed in **Annexure–B**.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

### **Archival of Documents**

Documents mentioned in clause (1) & (2) above shall be maintained/ preserved in the following manner:

All documents shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.

The Company is to maintain a functional website containing the basic information about the Company. The Company shall disclose on its website all Information and/or documents as specified in Regulation 46 (2) of the Listing Regulations, and all Information and/or documents as mentioned in Regulation 30 of the Listing Regulations.

The information and/or documents uploaded on the website shall be available for current financial year and for the preceding five financial years. All such information and/ or documents shall be

arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers.

After the expiry of five years, the information and/or document shall be removed from the main website. The Backup of said information and/or document which is removed from the main website shall be maintained/ preserved in the server of the Company. Such disclosures shall be preserved in a logical manner viz. as per nature/date of the disclosure, etc. to facilitate easy retrieval as and when required.

### **Destruction of Documents**

After the expiry of the statutory retention period, the preserved information and/or documents may be destroyed in such mode under any instructions approved by the Board of directors. 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.

### **Amendment**

In case of any subsequent changes in the Companies Act, 2013, Listing Regulations or any other applicable rules or regulations which makes any of the provisions in the policy inconsistent with the Act or regulations, the provisions of the Act or regulations would prevail over the Policy with effect from their enforcement and the Policy would be modified in due course to make it consistent with the amended laws. Any changes or modification on the Policy would be approved by the Board of Directors of the Company.

**Annexure A:**

**Documents whose preservation shall be permanent in nature:**

- a. All documents and Information originally filed with ROC for Incorporation of Company.
- b. Memorandum of Association and Articles of Association
- c. Register of Members.
- d. Index of Members.
- e. Minute Books of General, Board and Committee Meetings as per Companies Act, 2013.
- f. Authorization / licenses obtained from any statutory authority.
- g. Such other records as may be required under any law from time to time.

**Annexure B:**

**Documents to be preserved for a minimum period of not less than eight years after completion of the relevant transactions:**

- a. Annual Return(s) as per Companies Act, 2013.
- b. Statutory Registers.
- c. Tax related records and documents.
- d. Annual Financial Statements including annual accounts, director's report, and auditor's report.
- e. Copy of newspaper advertisement or publications.
- f. Disclosure/Return filed under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.
- g. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.