POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE:

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (Hereinafter called as "**The Regulations**") every listed Company is expected to frame a policy on preservation of key documents.

1.2 OBJECTIVE:

As SAFL's debt securities are listed with Bombay Stock Exchange (BSE) the purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them.

In order to efficiently conduct its business, the storage, retrieval and management of documents is critical. A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents. It also insulates the Company from possible legal actions owing to leakage of information or loss of original documents, particularly those submitted by the Borrower(s) at the time of availing the finance.

This policy seeks to ensure that the Company's document storage and retrieval system is well managed. This policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records. This policy is framed as per requirement of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

1.3 PURPOSE:

The purpose of the policy is to facilitate the following:

a. Identification of records that are to be maintained permanently or for any other shorter period of time.

b. Deciding the mode of preservation of documents, whether in physical form or in electronic form.

c. Retention of records for the periods required by applicable laws and regulations and for other business reasons for a period of time that will reasonably assure their availability when needed.

d. Preservation of the confidentiality and security of records/data.

e. Systematic and non-selective temperament of records not necessary for legal or business reasons."

1.4 SCOPE:

This policy is intended to establish guidelines for the maintenance, management and orderly temperament of corporate records / documents. The Company recognizes that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

2. DEFINITIONS

a) Act: "Act" means the Companies Act, 2013 including any amendment or modification thereof.

b) Board: Board means Board of Directors of the Company

c) Company: "Company" means Sustainable Agro-commercial Finance Limited.

d) Compliance Officer: "Compliance Officer" means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

e) Director: "Director" means a person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed as a Director in the Company.

f) Document: "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

g) Employees: "Employees" shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.

h) Key Managerial Personnel: "Key Managerial Personnel" shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.

i) Regulations: "Regulations" shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015

j) Secretarial Standards: "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.

k) Stock Exchange or Exchanges: "Stock Exchange" shall mean Bombay Stock Exchange Limited (BSE).

l) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

3. GOVERNING LAWS

This policy shall be governed by the Companies Act 2013, SEBI Act, Rules and Regulations, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

4. CLASSIFICATION OF DOCUMENTS

1 Documents shall be classified in the following categories

a) Mandatory under governing laws.

b) Non-Mandatory.

2 Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.

3 All records and documents as provided herein shall be preserved for such time and period as may be provided herein.

4 Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

5. PRESERVATION OF DOCUMENTS / RECORDS

Subject to clause 4 above, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors as the overseeing authorities deem fit, selected documents, required for easily accessible for day to day business activity, those are digitally scanned.

a. **Tax & Accounting, Records:** Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues and expenses including capital expenditure. Tax records should be retained for at least eight years from the date of filing the applicable return or such period of time as prescribed under Tax laws whichever is later.

b. **Employment Records/Personnel Records:** Labour laws require the Company to maintain certain recruitment, employment and personnel information. The Company should also maintain personnel files that reflect

performance reviews if any and any complaints brought against the Company or individual employees under applicable labour laws. The Company should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnelfile.

Employment and personnel records and other related documents of an individual employee shall be preserved as mentioned below.

As per section 13 A of Wages Act, such registers and records giving such particulars of persons employed, the work performed by them, the wages paid to them, the deductions made from their wages, the receipts given by them and such other particulars and in such form as may be prescribed shall be preserved for three years after the last payroll entry.

As per The Contract Labour Act, under Section 29 mandates the principal employer and contractor to maintain registers and records as prescribed and by virtue of Rule 80 (3) under Chapter VII of the Contract Labour (Regulation and Abolition) Central Rules, 1971 mandates that all such registers and other records shall be preserved in original for a period of three years from the date of last entry therein.

As a general rule, you should keep records for the following years: Personnel records for 7 years after termination. Medical and benefits for 6 years after the plan date.

Returns under various labor laws, governmental and statutory filings etc. need to be retained in accordance with the related statute.

c. **Financial Statements, Minutes, Statutory Registers & other Documents.** Financial Statements including Directors Report, Audit Reports, Minutes of Meetings of Board, Members and other Committees Meeting along with statutory registers as prescribed under governing laws for time being in force shall be preserved for such period as provided in respective laws. Any document where preservation period is not prescribed under governing laws shall be preserved for a minimum period of eight years.

d. **Press Releases/Public Filings.** The Company should retain copies of all press releases and documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities on a permanent basis.

e. **Legal Files / documents:** All legal documents / copies of notices / summons / orders / judgments and all other legal documents shall be preserved permanently. Documents like leases, Leave & License agreements and other agreements shall be preserved for at least ten years beyond the life of the said matter.

f. **Development/Intellectual Property and Trade Secrets:** Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development programs/new initiatives are often also of value to the Company and are protected as a trade secret where the Company:

   i. Derives independent economic value from the secrecy of the information; and

   ii. The Company has taken affirmative steps to keep the information confidential.

   The Company should keep all documents designated as containing trade secret information for at least the life of the trade secret i.e. till such time the information contained therein is widely circulated.

g. **Contracts:** Final, execution copies of all contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least five years beyond the life of the agreement, and longer in the case of publicly filed contracts.

h. **Electronic Mail:** E-mail that needs to be saved should be either:

   i. Printed in hard copy and kept in the appropriate file preferably and;
   ii. Downloaded to a computer file and kept electronically or on disk as a separate file so as to ensure its timely retrieval.

6. CUSTODY OF DOCUMENTS

All documents shall be under the custody of the following authorities as detailed below:

A) Head of the Departments (HOD):

Sl. No.	Documents	Responsible persons	Period of Preservation	Location
1	Tax / Accounting Records/	CFO.	For 8 years from the end of therelevant Financial Year.	Recent 2 years at head office and older than 2 years at Crown.
2	Financial Statements/ Minutes / Statutory Registers prescribed under the Companies Act, 2013/ Stock Exchange Filings/ Press Releases/Public Filings	Company Secretary & Compliance Officer.	Minutes – Permanently Statutory Registers- Permanently BSE Filings- Permanently Press Releases/Public Filings - Presently	Either at Head office or at rented storage.
3	Employment / personal Records:	Head of HR Department	For 10 years from the resignation of employee.	Either at Head office or at Crown.
4	Lease Documents / Contracts /Legal Documents and Intellectual Property and Trade Secrets	Legal Department / Head.	For 10 years beyond the life of said matter.	Either at Head office or Writers Information.
5	Electronic Mails	Respective Departments	Individual respective Department(s) in co-ordination with IT Department.	Email archives on local hard drive and live emails on cloud.
6	Administrative Record	Head of Admin Department	For 10 years from the date of expiry of document.	Either at Head office or at rented storage.
7	Records which are required for adducing evidence in judicial or quasi-judicial or other dispute redressed forum.	Legal Department / Head.	Till the time the matters are finally disposed of.	Either at local office or head office, depends on the ongoing pending litigation

8	Records, which will have a permanent value for the Company even after the expiry of legal preservation period. Documents Like: 1. Certification of Incorporation. 2. Certificate of Commencement of Business. 3. Certificate of Registration of NBFC(RBI) 4. PAN Card 5. TAN Card 6. MOA& AOA 7. Trademark Certificate. 8. Trust Deeds. 9. Gumasta License for Head Office. 10. PAN Card for Employees Group Assurance Scheme.	Legal Department / Head.	Permanent.	At head office locker.

* Crown Worldwide Pvt. Ltd
** Writers Business Services Pvt. Ltd through its division Writers Information Management Services.

B) Management :

Sl. No.	Documents	Responsible persons
1	Management Correspondence	MD & CEO in co-ordination with IT Department.

An annual confirmation from each of HOD will be sought to the effect that their respective departments are in compliance with the approved policy.

7. DESTRUCTION OF RECORDS:

The documents may be destroyed after the expiration of the period of their preservation as specified in clause 6 of the policy of preservation of the documents. Respective department head shall maintain the data of the destroyed documents in Register as well as in soft form and shall certify therein the date and mode of destruction.

8. AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) and guidelines. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) and guidelines .

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