

CLIX CAPITAL SERVICES PRIVATE LIMITED

POLICY ON

PRESERVATION OF

DOCUMENTS

&

ARCHIVAL OF DOCUMENTS IN

THE WEBSITE

Board approval date: 04-Sep-2020

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Last Review Date: 28-May-2025, 30-May-2024, 26-May-2023

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS ON THE WEBSITE

1. PURPOSE AND SCOPE

1.1 Pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 issued by Securities and Exchange Board of India ("SEBI") ("SEBI LODR") and Companies Act, 2013 including rules framed therein ("Act") (as amended from time to time) read with Prevention of Money Laundering Act, 2002 including rules framed therein, the Board of Directors ("Board") of the Company has framed a Policy for Preservation of Documents ("Policy")

1.2 The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on 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 the documents should be accessed and retrieved when they are needed.

2. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

2.1 The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:

- A. Documents whose preservation shall be permanent in nature;
- B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions;
- C. Documents whose preservation shall be for a minimum period of three years after completion of the event.

The details of documents for the above three categories are given in the Annexure.

3. PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

3.1 All the Employees on 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.

4. PERIODICAL REVIEW OF THE POLICY

4.1 The Board of the Company is authorised to periodically review the policy and make such changes as considered necessary.

5. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

5.1 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, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

6. STATUTORY REQUIREMENTS

6.1 If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

7. WEB ARCHIVAL POLICY

7.1 The Company shall disclose on its website all events or information which needs to be disclosed to stock exchange(s).

7.2 Such disclosures shall be retained on the website of the Company for a minimum period of five years.

7.3 At the end of the fifth year the information shall be archived and preserved for a further period of three years.



A. Documents whose preservation shall be permanent in nature:

1. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks
2. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, other Statutory Records and following statutory registers:
 - a. Register of Renewed and Duplicate Share Certificates
 - b. Register of Members
 - c. Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities)
 - d. Register of Charges
 - e. Register maintained u/s 187 of the Companies Act, 2013 (investment held in the name of any other person)
 - f. Register in maintained 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)
3. All Licenses and Certificates
4. Personal files of all live employees
5. Any other record as may be decided by the Board of the Company from time to time.

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

1. Books of Accounts, Bank Statements and vouchers
2. Notices from directors in Form MBP-1 as per Companies Act, 2013
3. Register of Debentureholders and any other Security Holder
4. Copies of Annual returns alongwith the annexures filed in compliance with the provisions of Companies Act, 2013
5. Filings with Stock Exchanges, Registrar of Companies and other statutory authorities.
6. Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retiral related Records, etc.
7. Attendance register, Agendas alongwith all related documents, agenda notes, notice calling the meeting and other related papers for all Board & Committee Meetings.
8. Records, viz. Invoices, Input Tax Credit Availed, Input register, Output register etc. maintained under Goods and Services Tax Act
9. Any other record as may be decided by the Board of the Company from time to time.

C. Documents whose preservation shall be for a minimum period of three years after completion of the event:

1. Tender Documents
2. Lease Deeds and Contracts
3. Legal files



4. Insurance Records including policies and claims
 5. All e-mail correspondence, internal & external
 6. Any other record as may be decided by the Board of the Company from time to time.
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