

POLICY ON PRESERVATION OF DOCUMENTS

The Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every listed entity to have a policy on preservation of records.

The Board of Directors of Manba Finance Limited (“the Company”) has adopted the Policy on Preservation of Documents (“the Policy”) which provides for the policy and procedure with regard to preservation of documents in accordance with The Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015. The Board (as defined below) will review and may amend this Policy from time to time.

DEFINITIONS

In this Policy, unless the context otherwise requires:

- i. “Company” means MANBA FINANCE LIMITED;
- ii. “Act” means the Companies Act, 2013 or Indian Companies Act, 1956 as the case may be;
- iii. “Listing Regulations” means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- iv. “Records” in relation to this Policy includes accounting records, books or papers and books and papers as defined in sub-section 12 of section 2, books of accounts as defined in sub-section 13 of section 2 of the Act, statutory and other documents of material significance whether covered under this Policy or not. Words and expressions used in this Policy but not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by SEBI or any other relevant regulation/legislation applicable to the Company.

Any subsequent modification and/or amendments brought about by SEBI in the SEBI (Listing Obligation & Disclosure Requirement) Regulation, 2015 shall automatically apply to this policy.

SCOPE OF THE POLICY

The purpose of this document is to maintain the policy regarding preservation of its documents in accordance with all the statutory and regulatory provisions applicable to the Company. The corporate records of the Company are important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose records as per this Policy. This Policy mechanism provides a comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations
- c) Systematic disposal/destruction of Company’s non-current records that have outlived their administrative usefulness.
- d) Identification of the Company’s records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company’s Archives. The Company understands the value of its records, information and data and the necessity to preserve them.

Classification of Documents to be preserved/retained

The board of directors has classified the documents to be retained and preserved in two categories which are mentioned below

1. Documents whose preservation shall be permanent in nature – as prescribed under Companies act, 2013 & Rules made thereunder.
2. Documents with preservation period of not less than 8 years after completion of relevant transactions as prescribed by law
- 3.

LOCATION OF RECORDS

As per Companies act, certain records shall be maintained at the registered office of the Company. The records for which no specific place has been specified under any statute shall also be maintained at the registered office of the Company or at any other place as may be approved by the Board, from time to time.

ACCESS AND AUTHENTICITY

The preservation of the records of the Company is vital in order to ensure all current and future access to the records. Preservation is also concerned with ensuring the authenticity of records. The Compliance Officer shall prepare a matrix for identifying persons who will be allowed to access different kinds of records maintained & preserved by the Company. Since the records are maintained at different levels and departments in the Company, therefore Functional/ Business Heads should be authorized to ensure the preservation and access to the records under their jurisdiction.

SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case the Company is served with any notice for request of documents or a governmental investigation or audit concerning the company or commencement of any litigation against the company, then disposal of documents shall be suspended until such time as the Top Management advises. Failure to abide by instructions to preserve documents in anticipation of litigation or regulatory inquiries may result in disciplinary action, which may include termination and prosecution under the law. Such documents shall be preserved until the completion of judicial proceedings.

REGISTER OF DOCUMENTS DESTROYED

The company shall maintain a register as per Annexure A enclosed hereto wherein it shall enter brief particulars of the documents destroyed and all entries made therein. It shall be authenticated by the Company secretary or any person authorized by the board for the purpose.

POLICY REVIEW

This policy shall be reviewed by the board of directors as and when any amendments need to be incorporated. Any changes in the policy would be approved by the Board of Directors.