Policy on Retention of Documents and Records

Approval Authority	**Board**
Owner of the Policy	**Compliance**
Reviewed by	**Board**
Review Frequency	**Annual**
Policy Approval Date	**June 12, 2023**
Last Review Done **Current Review Done**	**17 Jan’25 by Board** **30 Dec’25 by Board**

A. SCOPE AND PURPOSE

This policy represents Infina Finance Private Limited's (the "IFPL/Company") orientation with respect to the retention, preservation and disposal of Records/Documents in physical as well as in electronic modes.

The purpose of this policy is to ensure that necessary Records and Documents of IFPL which form an essential and significant part of the Company's resources, are adequately protected and maintained and are safeguarded form getting mishandled; also to ensure that Records that are no longer needed by the Company or are of no value are discarded at the proper time; aiding employees of the Company in understanding their obligations in retaining physical as well as electronic Records/Documents and also ensuring that the Records/Documents are handled efficiently.

The policy is guided by provisions, applicable, if any, as to retention/preservation of documents and/or Records as prescribed under the applicable Acts, Laws, Rules, Regulations etc. including statutory amendment(s), enactment(s) etc. thereof from time to time.

The Records/Documents not covered under this policy shall be preserved and maintained in accordance with the provisions of respective Acts, rules, guidelines and regulations as applicable in this regard to the Company under which those documents are required to be maintained.

B. DEFINITIONS

a) **"Act"** means the Companies Act, 2013 **Income Tax Act, 1961,** and **Credit Information Companies Act, 2005** Rules framed thereunder including statutory amendment(s), enactment(s) etc. thereof from time to time.

b) **"Applicable Law"** means
c) RBI Master Direction – NBFC Scale Based Regulation, 2021 (SBR)
d) RBI Digital Lending Guidelines (2022 & 2023 Clarifications)
e) RBI KYC Master Direction (2016, updated periodically)
f) Prevention of Money Laundering Act (PMLA) & Rules
g) Minimum Information Required for Investigation and Inspection Regulations, 2020
h) Insurance Regulatory and Development Authority of India (Registration of Corporate agents) regulations, 2015
i) Companies Act, 2013 & Rules
j) Income Tax Act, 1961
k) Information Technology (Reasonable Security Practices & Sensitive Personal Data Rules, 2011)
l) and all applicable statutes, law, ordinances, rules, by-laws, regulations, notifications, circulars, guidelines or standards under which the preservation of the Documents has been prescribed including statutory amendments, enactments etc. thereof from time to time.

m) **"Authorised Person"** means any person authorised to handle Records/Documents of the Company. For the purpose of the policy, below officials of the Company are **Authorised Persons** who will be responsible for custody, safekeeping, safeguarding and retention/preservation, maintenance and disposal/destruction of Records/Documents of the Company across functions:

Sr. No.	Designation of the Official	Functional Area
1	Accounts Manager	Finance, Accounting, Book-Keeping and Taxation
2	Operations Manager	Business Operations and Support
3	Legal Manager	Corporate, Litigations etc.
4	Human Resources Manager	Human Resources Management
5	Compliance & Secretarial Manager	Compliance / Corporate Secretarial
6	Treasury Manager	Treasury Back Office
7	Admin Manager	General Admin and Infrastructure
8	IT Manager	Information Technology and Infrastructure
9	Credit Manager	Risk and Credit

n) **“Board”** means the Board of Directors of the Company or its committee.

o) **“Documents”** pursuant to provisions of Section 2(36) of the Companies Act 2013 and Applicable Law/s include application(s), accounting record(s), affidavit(s), agreement(s), advertisement(s), Books of Account(s) as referred to in Section 2(13) of the Companies Act, 2013, correspondence(s), declaration(s), deed(s), form(s), financial statement(s), financial result(s), indemnity(ies), minutes, paper(s), note(s), notice(s), register(s), etc. and any other record or document required under or in order to comply with the requirements of Act or Applicable Law/s whether issued, sent, received or kept for time being in force or otherwise including amendment(s), alteration(s), change(s), modification(s), rectification(s) etc. thereof, maintained either physically or in electronic mode/form and include multiple or identical copies.

p) **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

q) **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

r) “**Employees”** In this policy employee means any person being in the bona fide permanent employment of the Company, if any including apprentices, trainees etc.

s) **“Maintenance”** means keeping Documents, either physically or in Electronic Form.

t) **“Preservation”** means to retain or to keep in good order and to prevent from being damaged or destroyed.

u) **"Register"** means registers, documents and records required to be maintained under the Companies Act, 1956/ Companies Act, 2013, Securities Contracts (Regulation) Act,1956, Depositories Act, 1996, SEBI (Listing Obligations and Disclosure) Regulations or under any law or regulation for the time being in force.

v) **"Records"** means documentary evidence of past events or transactions stored, maintained by the Company.

The words and phrases used in this policy and not defined here shall derive their meaning from the Applicable Law.

C. Interpretation:

In this policy, unless the contrary intention appears:

i. The singular includes the plural and vice versa;
ii. Any word or expression importing the masculine, feminine or neuter genders only, shall be taken to include all three genders

D. OBJECTIVE

This policy sets the standards for retaining and preservation of Records/Documents of the Company and is intended to guide the Company and its Employees for maintenance, retention and disposal thereof.

E. Classification:

The retention and preservation of Records/Documents is broadly categorised and shall be in the following manner:

1. Retention/preservation of Records/Documents for the period as prescribed and mandated under the Act or Applicable Law/s.

2. In case where no period prescribed and mandated under Act or Applicable Law/s, then for such period as the Authorised Person may decide considering the relevance and significance of Records/Documents.

The List of Documents and time-frame for retention and preservation of Records/Documents is provided in Annexure "A" annexed hereto.

F. Retention and Preservation:

1. The Records/Documents may be preserved either physically and/or in electronic form.

2. The Authorised Person shall be responsible for compliance of Act or Applicable Law/s with respect to retention and preservation of Records and Documents.

3. The retention and preservation of Records and Documents shall be done in such way so as to ensure that there is no tampering, alteration or destruction of the records and documents thereof. Nothing shall be done or carried out which will endanger the content, authenticity, utility or accessibility thereof.

4. Accessibility to such Records and Documents shall be available at all reasonable times and shall be controlled and monitored by Authorised Person to ensure integrity and prohibit authorised access or use thereof.

G. Custody:

1. Subject to provisions of Act and/or Applicable Law/s, Authorised Person shall be responsible for the custody of Records and Documents.

2. In case of resignation or otherwise of Authorised Person, he/she shall handover the custody of the Records and Documents om immediate basis to a Person as assigned by Chief Executive Officer of the Company.

H. Approval of policy and alterations, any, thereof:

The Board of Directors of the Company shall have an authority to approve the policy and alterations, if any, thereof, from time to time, subject to provisions of the Act or Applicable Law/s.

I. Destruction:

1. The Records and Documents which are duplicated, unimportant or of short term use only as maintained in physical and/or electronic mode shall be destroyed as per normal administrative practice.

2. The Records and Documents as referred to in Sub-Clauses No. 1 & 2 of Clause No. E above, shall be destroyed post completion period or time-frame of retention and preservation as mentioned therein.

3. An intimation as to destruction of Records and Documents covering the details of Records and documents so destroyed shall be given to Chief Executive Officer of the Company within 30(Thirty) Days from end of each of half-year.

J. Conversion:

1. The physical Records and Documents so retained or preserved may be converted whenever required or felt necessary in electronic form for ease of maintenance and accessibility thereof.

K. Other requirements:

1. All Records relating to, or created, or acquired in connection with the Company's business, property, or activities, as well as the information in them, are considered to be the Company's property and do not belong to individual Employees or third parties, regardless of the subject matter, storage media or location. Records and the information in them may be used only for Company business purposes and not for any personal purpose of employees. Records may not be copied for personal use or retention or for any other purpose except in furtherance of Company's business, or as required by law. Employees must return all Records to Company upon request or when separating from the Company.

2. Confidential information in Company records must be safeguarded from improper disclosure. No Records or information in them may be disclosed except in furtherance of Company's activities.

Annexure A

List of records and documents and timeframe/period of Retention & Preservation

Sr. No	Particulars of Records and Documents	Time-Frame or Period
A	**Companies Act, 2013 and Rules made thereunder**	
1	Registers of Members	Permanent
2	Register of Application and Allotment	----II---
3	Register of Transfers	----II---
4	Register of Directors, KMPs	----II---
5	Foreign Register of Members, if any.	----II---
6	Register of Significant Beneficial Ownership (BEN-2)	----II---
7	Minutes of General Meetings	----II---
8	Agenda / Minutes of Meetings and Resolutions passed by the Board of Directors and Committees thereof	----II---
9	Certificate of Incorporation and changes thereof	----II---
10	Memorandum and Articles of Association	----II---
11	Blank Share Certificate Books	----II---
12	Copies of all Notices, Reports, Summons and related documents	----II---
13	Notices, Agenda, Notes to Agenda, Acknowledgements, Proofs of Delivery of communications or Minutes to Directors, Comments from Directors, if any, on the Minutes and other related papers pertaining to Meetings of Shareholders, Board of Directors & Committees thereof	----II---
14	Such other registers or records or documents as may be required to be maintained under the Act.	----II---
15	Notices pertaining to Disclosures from Directors	----II---
16	Common Seal	----II---
17	Entry under Register of Charges	8(Eight) Years from date of satisfaction of the Charge

18	Annual Returns and annexures thereof	8(Eight) Years from date of filing with Registrar of Companies
19	Instruments Creating Charge or Modification thereof	8(Eight) Years from date of satisfaction of the Charge
20	Annual Reports and Relevant Forms filed	8(Eight) Years from date of filing with Registrar of Companies
21	Approvals and Consent Received	8(Eight) Years from date of Receipt
22	Recordings of Board Meetings / Committee Meetings / any other meetings	To be preserved at least till the completion of Audit for the particular period in accordance with Rule 3 of the Companies (Meetings of the Board) Rules 2014
23	Proof of delivery of Notice, Agenda, circular resolutions, draft minutes, final minutes of the Board and committees formed under Companies Act	3 years
B	**Direct or Indirect Taxes**	
1	Permanent Account Number	Permanent
2	Tax Deduction Account Number	----II---
3	Goods and Services Tax (GST) Registrations	----II---
4	Tax Returns, Assessments, Appeals, Challans, Acknowledgments etc.	10 (Ten) Years from date of Receipts or filing
C	**Accounts, Finance & MIS**	
1	Books of Accounts/ MIS	10 (Ten) Years from date of finalisation
2	Audited/Unaudited Financial Statements	10 (Ten) Years from date of approval
3	Unaudited Financial Results (UFR)	10 (Ten) Years from date of approval
4	Limited Review Reports on UFR	10 (Ten) Years from date of approval
5	Bank Statement	10 (Ten) Years from end of Financial Year
6	FA Register	10 (Ten) Years from end of Financial Year
7	Reimbursements and other Vouchers	10 (Ten) Years from end of Financial Year
D	SEBI(Listing and Disclosure Obligations) Regulations, 2015 and SEBI Circulars	
1	Quarterly or Annual Financial Results and statement under Regulation 52(4)	8(Eight) Years from date of submission
2	Record Date Disclosures of Commercial Papers	8(Eight) Years from date of submission

3	Disclosure as to Repayment of Commercial Papers	8(Eight) Years from date of submission
4	Quarterly Disclosures as to Utlization of Funds raised through Commercial Papers	8(Eight) Years from date of submission
E	**Business Operations and Support / Client servicing**	
1	KYC documents and other particulars furnished by the client, Customers files	10(Ten Years) from the date of rejection.
2.	KYC Documents and other particulars furnished by the client, applicant, customers files	Atleast 5 (Five Years) from the date of transaction
3	KYC Documents and other particulars furnished by the client, applicant, customers files	Atleast 5 (Five Years) after the business relationship is ended
2	Records at CERSAI Platform	8(Eight) Years from date of submission
3	Credit approval memo (CAM)/credit appraisal review notes (CRAN)	8(Eight) Years from date of approval
4	Agreement Register, Debit note, pledge, de- pledge requests from clients, pledging and un-pledging confirmations from NSDL and Fund house, Margin Call Letter, DP instruction list, Sale notice, Sale Details letter to client, contract note copy on sale, , approval authorities, process notes, instruction for Fund Transfer Payment Vouchers and Journal Vouchers	8(Eight) Years
5	Daily Bank Reconciliation Statements, Bank Reconciliation Transaction database, receipt and payment vouchers, Margin reports, Interest calculations,	8(Eight) Years
6	Customer Files, Master Laon Agreement, Pledge Agreement, POA, approvals, credit reports, customer correspondences	10 (Ten) Years from end of Business Relationship
F	Treasury- RBI/FIMMDA	
1	Information Memorandum (IMs) of Commercial Papers	8(Eight) Years from date of Issuance
2	Deal Papers, Corporate Actions and relevant documents	8(Eight) Years from date of Issuance
3	Listing Application and all required Enclosures	8(Eight) Years from date of Submission
4	Quarterly Disclosures to Issuing and Paying Agent (IPA)	8(Eight) Years from date of Submission
5	Bank Information and Correspondence	8 (Eight) Years
G	**Admin and Infrastructure**	
1	Vendor Contracts	Permanent
2	Rental/Conveyance Agreements of Properties of the Company	Permanent
H	**Legal**	
1	Corporate Agreements, Deeds as to Investments, Borrowings of the Company	Permanent
2	Trademark Registration Certificates	Permanent
3	Show Cause Notices, Reply Notices, Summons, Power of Attorney(s), Vakalat Nama(s) etc.	Permanent

4	Opinion letters	Permanent
5	General Correspondences and related confidential disclosure waivers	3 (Three) years
I	**Information Technology and Infrastructure**	
1	Vendors Contracts	Permanent
2	Service Providers Agreements	Permanent
J	**Compliance Records**	8 yrs for pt 1,2,3
1.	Correspondence with Regulatory Authorities	8(Eight) Years from date of Submission
2.	Copies of Returns Filed with Regulatory Authorities	8(Eight) Years from date of Submission
3.	Documents pertaining to Audit	8(Eight) Years from date of Submission
4.	Monthly Returns	8 years
K	**Human Resources Records**	
1.	Contents of salaried personnel file including Resumes	Permanent
2.	Joining Kit Appointment Letters and Remuneration Details	Permanent
3.	Changes to remunerations, promotions and Transfer details and Leave Records etc.	Permanent
4.	**Benefits and Employee Activities:** Historical Information Employee Correspondence Appraisals Recruiter / interview comments Employee Relocation- financial Assistance Files Resignation Letters and Full and Final Settlements Personnel detail record verifications	Permanent
5	**MIS** Headcount reports Muster- Absence Files Recruitment and Placement Agreements with Consultants	5 (Five) years 5 (Five) years 5 (Five) years after termination / expiry/ completion
6	**Appraisals** Incremental Approvals Salary Surveys Salary Administration Files	 5 (Five) years 3 (Three) years 8 (Eight) Years
7	Statutory Records relating to PF, ESIC, Prof Tax. Etc	Permanent
L	**Credit Department Records**	
1.	Application forms and FI of rejected cases	1(One) Month
M	**IRDAI**	
1	All books, documents, statements, contract notes, and related records	10 years from the end of the relevant financial year

Any record not specifically listed in the schedules has a discretionary retention period of minimum 3 years.

In case of exceptional situations, specific records can be retained for a period longer than that prescribed in the schedules. Such retention shall be at the discretion of the concerned Responsible Manager.

The storage of records shall be at the Registered Office / Head Office / Branch as applicable or at an offsite storage agency location.

Annexure 1

RECORD RETENTION CERTIFICATE
(FOR THE FINANCIAL YEAR _____)

To,
The Compliance Department
Infina Finance Private Limited
Head office
Mumbai

I am familiar with the Policy on Retention of Documents and Records applicable to my area of responsibility.

I have complied with the requirement of the maintenance and protection of Records applicable to my area of responsibility as mentioned in the Record Retention Schedule No. _______ in a diligent and good faith, in order to achieve compliance with the requirements of Policy on Retention of Documents and Records.

Name	
Employee code	
Date	
Place	

INDEX OF THE REVIEW OF THE POLICY

Sr. No.	Date of the Review
Approval	June 12, 2023
Reviewed	January 17, 2025
Reviewed	December 30, 2025