

## **POLICY FOR PRESERVATION OF DOCUMENTS/ARCHIVAL POLICY ('THE POLICY')**

### **I. BACKGROUND/OBJECTIVE**

Regulation 9 of Chapter III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Listing Regulations") requires the Company to frame a policy on preservation and archival of documents/records maintained by the Company either in physical or electronic mode. Further, Regulation 30 (8) requires the Company to frame a policy to disclose all such events or information which has been disclosed to stock exchange(s) on its website.

The Company understands that records keeping form an essential and significant part of the Company's resources. The website of Nuvama Wealth Management Limited (the "Company") provides for information on its business and operations for information and awareness of the stakeholders. The website is regularly updated, and certain information and documents are archived periodically so as to be available on the website, whilst simultaneously keeping it relevant.

### **II. SCOPE**

This policy shall govern the procedure of preservation of all documents and records maintained by the Company in physical form or electronically as required to be maintained under statutory and regulatory requirements viz., the Listing Regulations, the Companies Act 2013, and any other regulations and statutes as applicable to the Company from time to time.

The purpose of this Policy is to ensure that all necessary documents and records of the Company are adequately protected and preserved as per statutory requirements of applicable laws, and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving documents and records which are required to be maintained as per applicable statutory and regulatory requirements.

The Board of Directors of Nuvama Wealth Management Limited (the Company) have approved this Policy at its meeting held on July 14, 2023 and the same can be modified and or amended with the approval of Board of Directors from time to time.

### **III. APPLICABILITY**

This Policy is applicable to all the Documents maintained by the Company in physical and electronic form.

#### **IV. DOCUMENTS**

For the purpose of this Policy the term “ Documents” shall mean statutory records, registers, returns, forms etc. maintained and preserved by the Company in physical or electronic form under the Companies Act, 2013 , Securities Exchange Board of India Act, 1992 , Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1956.

##### **Indicative list of Documents whose preservation shall be permanent in nature**

###### **Companies Act, 2013**

- Certificate of Incorporation
- Memorandum and Articles of Association
- Register of Charges
- Register of Members and Record of Beneficial Owners
- Register of Loans and Investments made by the Company
- Register of Contract or arrangement in which director are interested
- Minutes of Board or Committee Meetings and resolution passed by circulations
- Minutes of the General Meetings of class of shareholders / creditors or resolutions passed by way of postal ballots
- Various Forms filed with the authorities under the Companies Act, 2013

###### **SEBI (LISTING OBLIGATIONS AND DEISCLISURE REQURIEMENTS) REGUALTIONS, 2015:**

- Listing Agreement executed with the Stock Exchanges
- Trading approval relating to listing of securities
- Offer documents for Public issues and Private placement of securities filed with the Regulators

###### **Depositories Act:**

- Confirmation of all corporate actions in respect of allotment of securities
- Intimation on allotment of International Securities Identification Numbers (ISIN) for securities issued

###### **Others:**

- License, documents, approvals etc. received from any government or regulatory authority
- Title deeds of properties
- Intellectual property documents
- Orders, Judgments of court or any adjudicating authority
- Documents under Company’s employee share-based incentive scheme

**Indicative list of Documents to be preserved for not less than 8 years after completion of the relevant transaction(s)**

**Companies Act, 2013:**

- Books of accounts
- The instrument creating a charge or modification
- Register of Charges
- Notice of interest by Directors and KMP
- Resolutions or agreements pertaining to the appointment, removal and resignation of Managerial Personnel
- Register of debenture holders or any other security holder along with index of name
- Annual Return and copies of all certificates and documents required to be annexed thereto as per Companies Act;
- Attendance registers, notices, scrutinizer's report, agenda, notes to agenda and other related papers of general meetings, board meetings and various committee meetings;
- Books and papers of the Demerged Company as handed over.

**Documents filed with the Stock Exchanges under SEBI Act**

**(a) SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015:**

- All the filings made with the Stock Exchanges
- Intimation and outcome of Board meetings
- All disclosure of various events to Stock Exchanges from time to time

**(b) SEBI (Prohibition of Insider Trading) Regulations, 2015**

- All the filings made under this Regulations
- Structure Digital Database after completion of the relevant transactions/in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

**(c) SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011:**

- All the disclosures and intimations filed under the above Regulations

**(d) SEBI (Share Based Employee Benefit) Regulation, 2014:**

- All the disclosures and intimations filed under the above Regulations

**Indicative list of Documents to be preserved for less than 8 years after completion of the relevant transaction(s)**

- Information collected at time of resignation of Designated person, including updated address and contact details in lines with SEBI (Prohibition of Insider Trading) Regulations, 2015 for a minimum period of five years.
- Tape recording(s) or other electronic recording mechanism used for Board/committees/shareholders meetings held through video - conferencing or audio - visual means atleast upto the time of completion of audit of that particular year.

**Others:**

Tax records viz. documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax authorities, shall be maintained for a period of 8 (eight) years from end of the relevant assessment year or till the disposal of the appeal against any demand by the highest authority, whichever is later.

All the documents and records required to be maintained under various statutes other than aforesaid Acts, have to be preserved as mandated under the respective Acts.

**V. ARCHIVAL OF INFORMATION HOSTED ON WEBSITE**

The information as statutorily required under the Listing Regulations shall be hosted on the Company's website for a minimum period of 5 (five) years and thereafter maintain this information under the archival section for a further period of 1 (one) year or such period as may be decided by the management of the Company from time to time.

All information required to be uploaded on the Company's website in pursuance of any other statute / legislation / regulation, shall be hosted on the Company's website for such period as may be mandated by the respective statute / legislation / regulation.

Any information/ form/ return/ document etc. disclosed on the website as per the above, may be removed/ deleted from the website after such disclosure period, subject to compliance with applicable laws, if any.

All information/documents hosted on the website of the Company voluntarily by the management shall be retained on the website/archive section for such period of time as may be deemed fit at the absolute discretion of the management of the Company, subject to compliance with applicable law, if any.

## VI. DESTRUCTION OF DOCUMENTS

Records beyond the period mentioned in the Policy and also those documents which are no longer serve a useful purpose should be destroyed with the written approval of the respective Functional Head. Destruction as a normal administrative practice, can be usually carried out if Documents are duplicated, unimportant or for short term use only. The modes of destruction of records can include methods like shredding, deleting, erasing, pulping, recycling etc. or any other mode for electronic records, such that it leaves no possibility for reconstruction of the records and information contained therein. Records of the documents destroyed would be maintained by the concerned department permanently.

## VII. DISCLOSURE

This Policy shall be disclosed on the Company's website, to facilitate the stakeholders in providing the required information which is of a statutory nature, for the given period in accordance with the Policy.

## VIII. CONFLICT IN POLICY

In the event of any conflict between the Companies Act, 2013 (the "Companies Act") or the Listing Regulations or any other statutory enactments ("**Regulations**") and the provisions of this Policy, the Regulations shall prevail over this Policy.

## IX. AMENDMENTS

The Board of Directors can amend this policy, as and when deemed fit. In case of any amendment/modification in any form viz., circular(s), notification(s), guideline(s) etc. to the Companies Act, 2013, the Listing Regulations and/or other applicable laws issued by relevant authorities not being consistent with the provisions laid down in the Policy, then such amendments(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.

### Version Control:

POLICY FOR PRESERVATION OF DOCUMENTS/ARCHIVAL POLICY	
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Reviewed by:	Pooja Doshi
Approved by:	Sneha Patwardhan
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