Document Preservation and Archival Policy

VERSION CONTROL

Version Control Number	Author	Date Created / updated	Date Effective	Version Description
V1	Jitendra Bhati VP – Compliance & Secretarial	5 February 2018	Upon listing of Equity Shares	--
V2	Binoy Parikh – Chief Compliance Officer & Shikha Jain (SEBI Chief Compliance Officer)	May 27, 2026	May 27, 2026	Consolidation of the Record Retention & Archival Policies

INTRODUCTION AND OBJECTIVE

The Document Preservation and Archival Policy ("**Policy**") consolidates the erstwhile Record Retention and Archival Policy. The Policy is adopted by the Board of Directors of **IndoStar Capital Finance Limited** ("**Company**" / "**IndoStar**" / "**ICF**") pursuant to applicable laws and regulations, including the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**SEBI LODR Regulations**"), the Companies Act, 2013, regulations and directions issued by the Reserve Bank of India ("**RBI**"), Securities and Exchange Board of India ("**SEBI**"), Insurance Regulatory and Development Authority of India ("**IRDAI**"), tax laws and other applicable statutes.

This Policy consolidates and harmonises the principles of:

- preservation and retention of records and documents; and
- archival of disclosures made to stock exchanges and hosted on the Company's website,
  without altering their underlying intent.

The objective of this Policy is to:

- ensure systematic retention, preservation, archival and destruction of records;
- ensure regulatory and legal compliance;
- prevent accidental destruction of records;
- ensure integrity, authenticity and accessibility of records; and
- optimize storage, operational efficiency and information governance.

This Policy shall be published on the Company's website.

2. APPLICABILITY AND SCOPE

This Policy applies to all records and documents created, received, maintained or preserved by the Company, irrespective of their form, including:

- physical records;
- electronic records;
- data, emails and digital communications; and
- disclosures made to stock exchanges and hosted on the Company's website.

3. DEFINITIONS

For the purposes of this Policy:

3.1 Documents / Records

All papers, books, records, files, registers, data and information required to be maintained under applicable laws, whether in physical or electronic form.

3.2 Electronic Form / Electronic Records

Any information generated, sent, received or stored in media, magnetic, optical or computer memory, microfilm, computer-generated microfiche or similar devices, in accordance with the Information Technology Act, 2000.

3.3 Archival

The process of removal of information from the active section of the Company’s website after a specified period, with continued preservation in a secure server or repository.

4. CLASSIFICATION OF RECORDS

Records and documents shall be classified into the following categories:

4.1 Records to be Preserved Permanently

Documents and records specified in **Annexure I** to this Policy and any other record required to be preserved permanently under applicable laws.

4.2 Records with Specified Retention Period

Documents and records that are required to be preserved for a specified period after completion of the relevant transaction, as prescribed under:

- applicable laws and regulations; or
- internal Record Retention Guidelines of the Company.
- Where multiple laws prescribe different retention periods, the longest retention period shall apply.

5. DOCUMENT RETENTION

5.1 IndoStar will follow the Document retention procedures, including in respect of information/ data in physical form or Electronic Form or Electronic Records, as outlined in the Policy and read with the Record Retention Guideline of IndoStar.

5.2 Documents that are not specifically listed hereunder, but are substantially similar to those listed, will be retained for the appropriate length of time. In case a similar record, including Electronic Record is also not listed then the same will be retained for such period as maybe prescribed under applicable laws, and in case no such period is prescribed, the same will retained as per internal Record Retention Guideline of IndoStar, if any, or permanently Access to records will be controlled by authorized person in IndoStar with preservation of Documents, information/ data in physical form or Electronic Form or Electronic Records, so as to ensure integrity of the Documents, information/ data in physical form or Electronic Form or Electronic Records, and prohibit unauthorized access to the same.

5.3 The Documents may be preserved either in physical form or Electronic Form. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

6. Nature of Records and Retention

6.1 The Documents/records, including Electronic Records (as mentioned in Annexure I hereunder) will be maintained permanently, along with the Documents/ records, including Electronic Records capturing any modification, amendments, additions or deletions made to the Document/ record by the Company.

6.2 Further, the Documents/records, including Electronic Records, which are to be maintained and preserved for a specified time period after completion of the relevant transaction, will be preserved by the Company for the term prescribed in the Record Retention Guideline of IndoStar unless:

(i) laws applicable to the Company prescribe a stricter retention period; or
(ii) any litigation/ legal proceeding pertaining to any of the Documents/ records is ongoing, in which case the relevant Document/ record, including Electronic Records will be preserved and retained until the litigation/ legal proceeding is closed/ disposed of/ settled and a final, non-appealable court order/ award has been passed in such litigation/ legal proceeding, (as the case may be).

7. ARCHIVAL OF WEBSITE DISCLOSURES

7.1 All events or information disclosed to stock exchanges under the SEBI LODR Regulations shall be hosted on the Company's website for a minimum period of **five (5) years** from the date of first hosting.

7.2 Upon completion of five (5) years, such disclosures shall be removed from the active section of the website and archived.

7.3 Archived disclosures shall be preserved securely on the Company's server or backup system for such additional period as may be prescribed under applicable laws or internal guidelines, after which they may be permanently destroyed.

8. DESTRUCTION OF RECORDS

8.1 Records that have completed their prescribed retention period may be destroyed in a secure manner as approved by the respective department head and with prior approval of the Compliance Officer.

8.2 Details of records destroyed shall be maintained in a **Register of Disposal of Records**, in the format prescribed in **Annexure II**, and shall include:

- particulars of records;
- date of destruction;
- date of approval; and
- authorisation details.

9. ROLES AND RESPONSIBILITIES

- **Board of Directors**: Approval and periodic review of this Policy.
- **Compliance Officer**: Overall monitoring of compliance with this Policy and applicable laws.
- **Department Heads**: Identification, maintenance and authorised destruction of records within their departments.
- **Employees**: Adherence to this Policy in creation, use, storage and handling of records.

10. COMPLIANCE AND REVIEW

10.1 The Company shall ensure compliance with all applicable and amended legal and regulatory requirements.

10.2 Non-compliance with this Policy may result in disciplinary action and other consequences as per applicable laws and Company policies.

10.3 For the purpose of this Policy, “Compliance Officer” will mean the Chief Compliance Officer of IndoStar or such other person as may be appointed in his/her place, from time to time, as Compliance Officer, by the Management Committee of the IndoStar.

10.4 This Policy shall be reviewed periodically by the Compliance Officer in consultation with senior management and internal auditors and placed before the Board for approval of any amendments.

11. INTERPRETATION

In the event of any inconsistency between this Policy and applicable laws or regulations, the provisions of such laws and regulations shall prevail.

12. LINKS TO OTHER DOCUMENTS:

(i) Record Retention Guideline

This Consolidated Policy supersedes the standalone Archival Policy and Record Retention Policy while preserving their original intent and regulatory substance.

ANNEXURE I – DOCUMENTS TO BE PRESERVED PERMANENTLY

(Indicative list covering constitutional documents, statutory registers, meeting minutes, regulatory approvals, audit reports, title deeds, intellectual property records and other documents required to be preserved permanently under applicable laws, aligned with the existing Record Retention Policy.)

S.No.	Date/Record Type	Department Responsible
1	Certificate of incorporation, certificate of commencement of business, Certificate of change of name (if any), certificate of registration with RBI;	Secretarial
2	Constitutional documents as amended from time to time;	
3	Listing agreement signed with stock exchanges/agreement with registrar and share transfer agents;	
4	Minutes books of general meetings, shareholder meetings, board of director meetings and various committee meetings;	
5	Attendance registers for attending meetings of board of directors/ committees / proxy forms and attendance slips for general meetings;	
6	Common Seal of the Company;	
7	Register of deposits, if any;	
8	Register of debenture-holders, including index of debenture-holders (from the date of redemption of debentures);	
9	Foreign register of debenture-holders (from the date of redemption of debentures);	
10	All books and Documents relating to the issue of share certificates, including the blank forms of share certificates;	
11	Annual return of the Company and copies of all certificates and documents required to be annexed thereto;	
12	Orders passed by any court / tribunal / competent authorities which are final in nature and cannot be superseded;	Legal
13	Correspondence, fillings with and approvals obtained from authorities, including Registrar of Companies, regulatory authorities such as RBI, IRDAI, SEBI, MCA	Compliance
14	Investment records (excluding investments made in the normal course of business of the Company);	Treasury
15	Provident Fund / Gratuity Trust Deeds;	Human Resources
16	Signed statutory audit reports of the Company and signed financial statements of the Company	Finance and Accounts
17	Signed internal audit reports of the Company	Internal Audit
18	Intellectual property and trade secret related agreement and Documents/ records;	Respective Departments
19	Property title deeds, including purchase/sale deeds, assessments, licenses relating to property and correspondences in relation to property owned by the Company;	
20	Any other Document/ records as may be required to be maintained permanently in terms of the applicable laws.	

ANNEXURE II – REGISTER OF DISPOSAL OF RECORDS (SPECIMEN FORMAT)

Particulars of Document	Date of Destruction	Date of approval	Initials of the authorised person