PAHAL FINANCIAL SERVICES PRIVATE LIMITED

Preservation of Documents Policy

The Preservation of Documents Policy is approved by the Board of Directors at its Meeting held on 6th May 2026 with updation of regulatory guideline reference with no change.

Version Control:

Version	Date of Approval
Version 1.0	Initial Issue
Version 1.0 (Regulatory reference update)	06.05.2026

Changes to the Policy:

Policy Reference	New Version	Updated Area	Description of the Changes	Rationale
Version 1.0 of Preservation of Documents Policy	Version 1.0 (No version change)	Regulatory Guidelines updates	Updated references to align with the latest applicable regulatory guidelines.	To ensure compliance with the most recent regulatory requirements.

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Preservation of Documents Policy

1. Legal Framework:

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all the listed entities, one of the common obligations for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

The Board of Directors of Pahal Financial Services Private Limited ("PFSPL") is obliged to formulate a policy for "Preservation of Documents" to comply with the requirements of Regulation 9 of the Listing regulations.

Reserve Bank of India (RBI) vide Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025 dated November 28, 2025 (as updated)Chapter VII (47), Rule 3 of Prevention of Money Laundering (Maintenance of Records) Rules, 2005 (PML Rules, 2005), states that NBFCs should take appropriate steps to evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities.

2. Definition:

"Act": means Companies Act 2013

"Board": means Securities and Exchange Board of India;

"**Company":** means Pahal Financial Services Private Limited;

"**Compliance Officer**": The Company Secretary and/or a Key Managerial Person appointed by the Board of Directors of the Company as the Compliance Officer for the purpose of these regulations from time to time;

"**Documents"**: means all papers, records, files, books including in soft/digital format etc., and the like as required to be maintained under any law or regulation for the time being in force;

"**Listing Regulations**" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

"**Head of Department**" means the functional head of department will be as per Annexure 1

All other words and expressions used but not defined in this policy but defined in the Act, the SEBI Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and/ or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

3. Responsibility for preservation of documents

The head of respective departments shall be responsible for ensuring the preservation of documents pertaining to their area of responsibilities in accordance with the applicable laws/regulation.

4. Objectives:

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

A. Documents whose preservation shall be permanent in nature:

All the documents of the company which are permanent in nature shall be kept by the company in hard copy at the corporate office of the company or any other place as decided by the management of the company as follows:

- All type of Certificates i.e. Certificate of Incorporation, certificate for change in name of company;
- Memorandum of Associations and Articles of Association of company as amended from time to time
- Minutes Books of Company in binding form
- Register of Postal Ballot
- Register and Index of Debenture Holder
- Register of Members of Company
- Register of Investments
- Register of Transfer and Transmission of Securities
- All type of Licenses and permits from any statutory authority
- Court Orders
- Annual Audit reports and Financial Statements
- All property documents and various type of Lease-Deed entered by the company

Contracts & Agreements and legal case files

Final, execution copies of all the contracts and agreements entered into by the company should be retained permanently and should be destroyed with the permission of management.

All the files relating to Legal cases filled by the company or filled against the company should be preserved permanently by the company.

Electronic Mail: E-mail that needs to be saved should be either:

i. Printed in hard copy and kept in the appropriate file; or
ii. Downloaded to a computer file and kept electronically or on disk as a separate file.

Electronic documents will be retained as if they were paper documents. Therefore, the electronic files should be maintained for the appropriate amount of time depending upon the subject matter of the email and should be determined primarily by the application of the general guidelines affecting document retention. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods should be tested on a regular basis.

Provided further that the Company may keep the documents as specified above in electronic mode

B. *Documents with preservation period of not less than eight (8) years after completion of the relevant transactions*

- **Tax Records**

Tax records may be retained for a period as provided under the applicable provisions under various taxation laws from the date of filling the applicable returns.

- **Accounting and Financial Records**

The company shall retain the Annual Plans and budgets at least for a period of 3 years or higher as decided by the management of the company.

PFSPL shall retain all the accounting documents viz accounting ledgers, accounts receivables, audit reports, cost audit reports, bank statements and cancelled cheques, investment records, quarterly and annually statements of profit & loss and balance sheet of the company and other expenses records atleast for a period of Eight (8) years.

Annual reports and returns will be maintained for a period of eight (8) years.

- **Insurance Records**

The company shall retain the insurance plans which are renewable on yearly basis be kept for a period of 1 year from the date of expiry and group insurance policy of active employees, claim files, annual loss summaries of the company shall be preserved for a period of 8 years.

C. *Documents with preservation period of not less than five (5) years after completion of the relevant transaction*

In terms of PML Amendment Act 2012, company will maintain for at least five years from the date of transaction between the company and the client, all necessary records of transactions, both domestic or international, which will permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of persons involved in criminal activity.

(ii) Company will ensure that records pertaining to the identification of the customers and their address (e.g. copies of documents like passports, identity cards, driving licenses, PAN card, utility bills, etc.) obtained while opening the account and during the course of business relationship, are properly preserved for at least five years after the business relationship is ended as required under Rule 10 of the Rules ibid. The identification of records and transaction data would be made available to the competent authorities upon request.

D. Others

- **Employment and Personal Records:**

Several state and central laws require the company to keep certain documents viz. employment, personal and recruitment information and shall also the personal files that reflects performance reviews and any complaints brought against the Company or individual employees under applicable Central & State statutes.

Employment and personnel records should be retained for six years or till the cessation of the employment whichever is later.

- **Record of transactions with the customer:**
  - all necessary records of transactions between the NBFC and the customer for at least five years from the date of transaction
  - the records pertaining to the identification of the customers and their addresses obtained while opening the account and during the course of business relationship, **for at least five years after the business relationship is ended**

5. <u>Responsibility of Employees for preservation of documents</u>:

The Head of Departments shall be 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.

6. <u>Preservation Principle:</u>

- It is only through preservation that continued availability and access to items in the collections can be maintained. The following principles shall be kept in mind.
- Where possible, documents are preserved in their original format, respecting the physical integrity and authenticity of the original documents.
- Active conservation is employed when appropriate to prevent further deterioration or damage to an item, or to enable access to be given.
- Appropriate conservation measures will be taken into account with respect to the needs, value, significance and usage of item in question.
- Surrogates shall be created where appropriate to protect the original, and to allow wider access to the content. Surrogates shall not replace the original, which will still need preservation.

7. <u>Security of Documents:</u>

The Board shall ensure that all the documents shall be kept in safe place in the Company premises or any suitable place. The Board may authorize person for the security of documents, who shall be responsible for safe custody of documents.

8. <u>Disposal of Documents:</u>

Disposal of documents after said period of years (whose preservation shall not be permanent in nature) shall be done with approval form the Directors in the presence of respective Head of Department. Before disposing a soft copy shall be taken for record.