

FYNX CAPITAL LIMITED
(formerly known as Rajath Finance Limited)

Policy on Preservation of Documents

Scope

A Policy on preservation of Documents would ensure safekeeping of the records and safeguard the documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The company therefore formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), on preservation of the Documents to guide employees in handling the Documents efficiently. The Policy not only covers the various aspects of preservation of Documents, but also safe disposal / destruction of the Documents.

Definitions –

- i. "Act" means the Companies Act, 2013.
- ii. "Applicable Law" means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA) and the Institute of Company Secretaries of India (ICSI) under which preservation of Documents has been Prescribed.
- iii. "Authorised Person" means any person duly authorised by the Board.
- iv. "Board" means the Board of directors of the Company or its Committee.
- v. "Company" means Fynx Capital Limited.
- vi. "Current Document(s)" means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- vii. "Documents(s)" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and / or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on physical / paper or in Electronic form and does not include multiple or identical copies..
- viii. "Electronic Record(s)" means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- ix. "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 or access to it.
- x. "Maintenance" means keeping Documents, either physically or in Electronic Form.
- xi. "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- xii. "Regulations" means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.
- xiii. "Archival" means an accumulation of historical records or the physical place they are located. The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law(s).

Coverage

This Policy is intended to guide the Company and its Officers on maintenance of any Documents, its preservation and disposal.

Classification

The preservation of Documents shall be done in the following manner:

- Where there is a period for which a Document is required to be preserved under specific Law / Act, for the period required by the Applicable Law / Act.
- Where there is no such requirement as per Applicable Law / Act, then for such period as the document pertains to a matter which is "Current".
- In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Documents takes a considered view about its relevance;

Provided that a document not covered in i, ii and iii above may be preserved for a period of 5 years from the date on which the document was generated.

An indicative list of the Documents and the timeframe of their preservation is provided in Annexure I

Modes of preservation

- The Documents may be preserved in physical / paper form or Electronic Form.
- The Officer of the Company required to preserve the Document shall be an Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law.
- 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.
- The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

Custody of the Documents

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall handover all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his / her possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

Authority for approval of Policy

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via the Regulations.

Authority to make alterations to the Policy

The Board is authorised to make such alterations to this Policy as considered appropriate. subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

Destruction of Documents

- i. Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents.
- ii. The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The Categories of Documents may be destroyed as normal administrative practice are listed in Annexure II
- iii. A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.

The entries in the register shall be authenticated by the Authorised Person.

The format of the register has to be in accordance with Annexure III.

Conversion of the form in which the Documents are preserved

- The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- This will be done after obtaining prior approval of the Board.

Authenticity

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

Interpretation

In any circumstances where the terms of this policy differ from any existing or newly enacted Law, Rule, Regulation, Standard governing the Company, the Law, Rule, Regulation, Standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the changed / revised Law, Rule, Regulation and Standard.

Annexure – I

Indicative list

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
Companies Act, 2013	
The Memorandum and Articles of Association of the company	Books of Accounts and its related papers (8 Financial years)
All Documents and information as originally filed with ROC for Incorporation of Company and Declaration / Affidavit from the subscribers to the memorandum and from persons named named as the first directors	Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)
Register of members	Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)
Books and Documents relating to the issue of renewed and duplicate share certificates, including the blank forms of share certificates	Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)
The foreign register of members	All notices pertaining to disclosure of interest of directors. (8 years from the date of receipt)
Annual Reports	All certificates surrendered to a company (3 years from date of surrender)
Minutes book of general meeting	Register of deposits (not less than 8 years from the date of last entry)
Record of Private Placement	Instrument creating a charge or modification (8 years from date of satisfaction of charge)
Register of Sweat Equity Shares	Register of Transfer and Transmission (8 Years from the date of Transfer / Transmission)
Register of Buy Back of Security	Register of Employee Stock Option (8 years from the date of exercise of Option)

Register of charges	Register of Loan Investment and Guarantee. (8 Years from the date of giving Loan / Guarantee or till the time the Loan / Guarantee exists whichever is later)
Register of Contracts and Arrangements in which Directors are interested	Register of Investment made by Company not held in its name. (8 years from the date of making such investment or till such time the Investment exists whichever is later)
Register of Beneficial Interest	Contract of Services with Managing Director and Whole time Director (5 years from the date of execution / approval of Contract or till such time the Managing Director / Whole time Director is in employment whichever is later)
Register of Directors & KMP	Register of Unpaid Dividend. (7 years from the date of transferring it to Unpaid Dividend Account and thereafter on an archival basis)
Secretarial Standard	
Minutes of Board meeting	Office copies of Notices, Scrutinizer's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS2)
ROC	
Copy of all the e-forms alongwith its annexures / attachment filed with the ROC	
SEBI	
	All such events or information which has been disclosed to stock exchange(s) and such disclosures has been hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company
Stock Exchange	
	Office copies of papers, documents, information filed with the Stock Exchanges and related papers (as long as they remain current or for 5 years or as long as they remain current

Annexure II

The following categories of Documents may be destroyed as normal administrative practice:

- catalogues;
- copies of press cuttings, press statements or publicity material;
- letters of appreciation or sympathy, or anonymous letters;
- requests for copies of maps, plans, charts, advertising material;
- facsimiles where a photocopy has been made;
- drafts of reports, correspondence, speeches, notes, spreadsheets, etc.; and
- routine statistical and progress reports compiled and duplicated in other reports.

Annexure III

The format of the register of Documents disposed/destroyed

Particulars of document along with provision of applicable law	Date and mode of destruction	Name of the Authorised Person	Initials of the authorised person