

Policy for Preservation of Documents and Archival

Objective:

The purpose of this policy is to ensure and establish standards for managing Company Documents and Records in an appropriate, systematic and timely manner, with adequate protection for preservation as per the statutory requirements and safeguard them from getting mishandled. The standards shall ensure that:

- The right information is captured and stored;
- The records can be located, easily accessed and retrieved when needed;
- The information can be relied on and their integrity and authenticity demonstrated;
- The information is capable of preservation over time.

Scope & Applicability:

This document will apply to all Companies under PDS Group. The local laws will override this policy and the business must track law of the land over and above this policy.

Background :

This Policy shall cover all statutory, financial transactions, accounts and journals, expense account documents, contracts, business correspondence, email messages, documents or reports submitted to government or regulatory authorities, any scanned document stored on computer media, customer records and any other material produced by a computer or by any other device of the Company, including written, printed and recorded matter and electronic forms of records or documents. This Policy also envisages the purpose of aiding staff of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory provisions and regulatory requirements.

Definitions/Key Terms:

- a) Board of Directors' or 'Board' shall mean the Board of Directors of 'PDS Limited, as constituted from time to time.
- b) 'Company' shall mean 'PDS Limited'.
- c) "Applicable Law" means any Law, Rules, Circulars, Guidelines or Standards issued by the Central Government, Reserve Bank of India, Securities Exchange Board of India, Ministry of Corporate Affairs, The Institute of Company Secretaries of India or any other statutory/regulatory authorities, in which the preservation of the Documents is prescribed.

- d) "Electronic Record(s)" means the electronic record as defined under section 2 (1)(t) of the Information Technology Act, 2000 including statutory modification on reenactment or substitutions.
- e) Documents' shall mean all Records, Papers, Files, Vouchers, Registers, Ledgers, Cash Scrolls, Manuals, Agreements, Paid Cheques, Drafts, Orders, Declarations, Forms, Books, Tapes, Floppies, CDs, DVDs, Electronic Storage Devices, etc. and the like as required to be maintained under any applicable law or regulation for the time being in force or in existence, maintained in physical or electronic form or both and does not include multiple or identical copies.
- f) Electronic Form" means any contemporaneous electronic devices such as Computer, Laptop, Desktop, Compact Disc, space on electronic cloud or any other form of electronic storage and retrieval device, considered feasible, whether the same is in possession or control of the Bank or otherwise the Bank has control over the access to it.
- g) Records Management or Document Management is defined as all those actions which result in efficient and systematic control on the creation, receipt, maintenance, use and disposition of records.
- h) 'SEBI Listing Regulations' shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations').
- i) "Maintenance" means keeping Documents, either physically or in Electronic Form.
- j) "Preservation" means to keep in good order, preventing from being altered, damaged or destroyed.
- k) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

Roles & Responsibilities :

- a) Board: Oversight
- b) CEO's Office: Implementation and Monitoring.
- c) Employees: Responsible for preservation decisions within their area of work.
- d) Records Management Team: To prepare and update a Master Records Retention Schedule, ensure compliance, and oversee document storage, transfer, and disposal.

Procedure & Other Details

- **Principles of Records or Documents Management:**

Record or Document management should be based on three principles:

- Complete, accurate and high quality records to be maintained
- Records or Documents that are not needed daily and/or weekly should be maintained in the designated off-site storage facility.
- To promote greater efficiency, cost savings, and administrative economy, records should be properly disposed of upon the expiration of record retention schedule.

- **Principle of Responsibility of Employees for Preservation of Documents.**

- All the employees in the permanent or contractual rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their area of work / assignments and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help the Company's litigation preparedness, helping the Legal Department and External Legal Counsels of the Company in tracking down the documents and to efficiently handle the legal cases.
- A Records Management Team should be formed consisting of representatives from all the departments of the Company, who should prepare a Master Records retention Schedule (as may be revised from time to time) after considering the statutory and regulatory requirements.
- In the event that a representative of the Records Management Team leaves the Company, back-up arrangement should be made for the affected departments until a replacement is identified.
- The representatives of various departments should periodically review the type of records maintained in his/her department and notify the Records Management Team of any proposed changes. Responsibility should be assigned to representatives in each department to perform the activities given below:
 - ✓ Records that should be captured are being processed either in electronic form or in paper form and there is no unwarranted duplication between electronic and paper records;
 - ✓ Assigning unique identity to the electronic and paper records;
 - ✓ Maintaining inventory of the collected records and ensuring transfer or disposal;
 - ✓ Keeping the records secure and monitoring access;
 - ✓ Facilitating prompt retrieval;
 - ✓ Comply with regulatory requirements on maintenance of records.

- Optionally, decision may be taken to outsource the maintenance of the records to service providers selected on the basis of the Outsourcing policy.
- All individuals performing duties related to records management should be fully apprised of these policies and the processes identified for records management and bear responsibility for their observance.
- Classification of Documents:
Information should be selected for storage as records as well as disposal using defined selection criteria. In order to ensure that information constitutes a record, the business entity should ensure that the information:
 - It is critical for the continuing operations of the business entity.
 - It is important for permanent preservation in the archives.
 - It is required to be retained in accordance with statutory / regulatory requirements.
 - It is non-current and can be considered for disposal.

Based on the recommendations of the Management, the Board has classified the following documents to be retained and preserved for future as required under the relevant provisions of applicable Law & Rules:

Category A	The Documents of permanent nature shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time; provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.
Category B	The Documents of the Company to be maintained and preserved for specified time period after completion of the relevant transactions shall be preserved by the Company for the term not less than ten years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that all such modifications, amendments, addition or deletion in the Documents shall also be preserved for a term not less than ten years. Further the Company may, if deemed fit and possible from time to time, maintain mentioned documents in electronic form, to the extent possible.

*An indicative list of Documents and the timeframe of their preservation is provided in **Annexure 1** to this Policy. The local laws will override this policy, and the business must track the law of the land over and above this policy.*

Notes:

- a) Documents which are required to be mandatorily maintained and preserved by the Company shall be preserved for such duration as may be specified by the relevant statute or regulation, as the case may be.
 - b) Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this Policy.
 - c) Any other Document which is not mentioned specifically in the list should be maintained for 10 years period.
 - d) Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this Policy.
 - e) In case of dispute with tax authorities or government authorities, records and documents relating to dispute shall be preserved till the settlement of dispute or ten years, whichever is later.
 - f) Records pertaining to transactions listed out in Rule 3 of The Prevention of Money-Laundering (Maintenance of Records of the Nature and Value of Transactions, The Procedure and manner of Maintaining and Time for Furnishing Information and Verification and Maintenance of Records of the Identity of the Clients of the Banking Companies, Financial Institutions Intermediaries) Rules, 2005, shall be maintained for a period of ten years from the date of cessation of the transactions between the client/customer and the Company.
 - g) The Company should ensure that records pertaining to the identification of the vendors, suppliers and his/her address (e.g. copies of documents like passports, identity cards, driving licenses, PAN, utility bills etc.) obtained while opening the account and during the course of business relationship, are properly preserved for at least ten years after the business relationship is ended.
 - h) Master Records Retention Schedule (as may be revised from time to time) should be prepared in every Company of the Group. The period for retention of the records should be defined for each class of records, bearing in mind the regulatory and statutory requirements such as the Income tax Act, which requires records to be retained for eight years.
 - i) Those records deemed to be worthy of permanent retention, either because they represent an enduring record of the conduct of business or because they are required to be maintained under laws / regulations, shall be transferred to the archives.
- Mode of Preservation and access to records
 - a) The Documents may be preserved in Physical Form or Electronic Form. Maintenance of records in electronic form and use of technology to maintain records should be encouraged. For this purpose, the system should be selected based on its ability to cope with electronic records without any loss of information because of incompatibility or inadequate safeguards.
 - b) The retention period of preservation of documents shall remain the same, irrespective of maintenance of documents in physical or electronic format or both.

- c) Where a Document is being maintained both in physical form and Electronic form, the authenticity with reference to the physical form should be considered for every purpose.
- d) The officer of the Company required to preserve the Document shall be an Authorized Persons, who is generally expected to observe the compliance of the requirements of Applicable Law.
- e) The preservation of Documents should be such as to ensure that there is no tampering, alteration and destruction. All information once recorded should be safe from alteration and loss. Nothing shall be done which endangers the content, authenticity, utility or accessibility of the Documents.
- f) Records relating to any matter that is, or may reasonably be anticipated to become, the subject of any pending or threatened litigation, governmental investigation or audit, court order, or other special legal requirement shall be safeguarded against any alteration, loss, or destruction. When any of these circumstances become apparent, a records hold order shall be placed on the relevant records and the records shall be lifted only with the approval of the Legal department/designated employee of the Company.
- g) The Documents should be categorized based on their nature and confidentiality. The original Documents of Importance is to be kept in fire proof storage and, if required, locker facility can be availed to ensure safe-keeping of the records and to safeguard the Documents from getting mishandled.
- h) All policies, documents and other information not related to any particular period/ event shall be on display on the Company's website till they are replaced by an updated version. Thereafter they will be archived and preserved in a secured server of the Company.
- i) Guidelines should be defined by the business entity on assignment of unique identity to the records to ensure that the records are well organized and can be retrieved efficiently.
Uniformity in the method across the business entity should be ensured. The identification method should:
 - o Classify the records into a series that has meaningful titles and a consistent reference code;
 - o Use a sub-series and a sub-series for more specific identification such as linkage to the originating department, etc.
 - o The creator of the records shall be responsible for allocating the series to the records
- j) The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Persons with preservation, so as to ensure integrity of the Documents and to prohibit the unauthorized access.
- k) An access policy should be defined (limits of type and origin of records as well as nature of its contents) to control the movement of information in and out of the records management system. The department/user should obtain written

approval and should also mention whether the retrieval of information is critical (needed within a couple of hours) or non-critical (within two or three days).

- l) Any access arrangement shall be made for a specific duration and return of the records assured.
- m) All events or information which, in the opinion of the Board of Directors of the Company, is material and has hence been disclosed to the stock exchange(s) in terms of Regulation 30 of the Listing Regulations, shall remain on display on the website of the Company for such period time as may be prescribed by the SEBI Listing Regulations from time to time and thereafter shall be archived for retrieval for such period decided by CEO/CFO/Company Secretary from time to time, subject to applicable law.
- n) The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per this policy.
- o) Where any law provides that documents, records or information shall be retained for any specific period, that requirement shall be deemed to have been satisfied if:
 - The manner and format therein remains accessible so as to be usable for subsequent reference;
 - The record is retained in the format in which it was originally generated, sent or received or in a format which can be demonstrated to represent accurately the information originally generated, sent or received.
 - The details which will facilitate the identification of the origin, destination, date and time of dispatch or receipt of such electronic record are maintained.
- p) Strict back-up cycles for Information Technology department to be ensured. Maintenance of the files for all Company networks, servers, personal computers and application data files are critical to the viability and operations of the Company. Following standard practices to be followed:
 - All data files to be stored on the network server. Employees utilizing laptops remotely for business purposes should be responsible for ensuring that all data files are backed- up to the network server on a regular basis.
 - Back-up system, software and file format changes with their effective date should be noted.
 - Changes in accessibility of records retained (due to change in system and compatibility issues) should be reported.
 - Periodic audit trials should be designed to ensure easy and complete access of records.
- q) The overriding principle guiding the choice of location of records is that they will continue to be available to Management on a timely basis. The following principles will be taken into account for selecting the record location:

- The records and data are available to management on a timely and reasonable basis
- Adequate back-up facilities will be made available for electronically stored data.
- Accessibility of the record location from the point of view of RBI audit, internal and external auditors.
- Secrecy and confidentiality of data to be maintained.
- Safety of Records both in-house and third party (with economy in cost)

- **Custody of Documents:**

All documents shall be under the custody of respective head of the departments as detailed below:

Sl. No.	Documents Authorized Persons	Authorized Persons
1	Tax / Accounting Records / Financial Statements	Chief Financial Officer
2	Board and Committee Minutes / Statutory Registers	Company Secretary
3	Employment / Personnel Records / Lease Documents / Contracts	Head HR
4	Customer Transaction documents & KYC documents Head-Operations	Head Operations
5	Legal & Secretarial Documents	Head Legal & Company Secretary
6	Intellectual Property and IT records	Head Legal & IT

- **Destruction of Documents:**

- a) Each department should conduct a formal record purging process on annual basis to identify and destroy records that have become obsolete. The Master Record Retention Schedule should also be adhered to at the time of disposal of these records.
- b) The Company should nominate an independent team to monitor the disposal/destruction process.
- c) 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.
- d) The temporary Documents shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose 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.
- e) The documents specified in the Annexure 1 to this Policy, kept by the Company, may be destroyed after the expiry of the minimum retention period specified in the **Annexure 1** and after review and approval by the Managing Director or such other person(s) as may be authorized by the Board for this purpose. However, in the case of pending matters/ litigation/ disputes, the documents shall be preserved till the resolution of pending matter/ litigation/ dispute. 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 local laws will override Annexure 1 and the business must track law of the land over and above this policy.

- f) The entries in the register shall be authenticated by the Authorized Person(s).

Annexure 2.

- **Maintenance of the records of transaction:**

The Company shall maintain proper record of transactions as required under section 12 of the PMLA, 2002 read with Rule 3 of the PML Rules as mentioned below:

- a) All cash transactions of the value of more than Rupees Ten lacs or its equivalent in foreign currency;
- b) All series of cash transactions integrally connected to each other which have been valued below Rupees Ten lacs or its equivalent in foreign currency where such series of transactions have taken place within a month and the aggregate value of such transactions exceeds Rupees Ten lacs;
- c) All transactions involving receipts by non-profit organizations of Rupees Ten lacs or its equivalent in foreign currency;
- d) All cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security or a document has taken place facilitating the transactions; and all suspicious transactions whether or not made in cash and by way of as mentioned in the Rule 3(1) (D).
- e) The internal monitoring system should have an inbuilt procedure for reporting of such cash transactions and those of suspicious nature whether made in cash or otherwise, to the Principal Officer on a fortnightly basis. However, there is no need to furnish NIL reports.

- **Records Appraisal:**

The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process is to ensure the records are examined at the appropriate time to determine whether or not they are worthy of archival preservation, whether they need to be retained for a longer period as they are still in use, or whether they should be destroyed.

The following categories of the Documents may be destroyed as per normal administrative procedure of the company:

- a) Brochures
- b) Copies of Press cutting, press statement or publicity material
- c) Letters of appreciation or sympathy or anonymous mail.
- d) Request for copies of maps, plan, charts, advertising material.
- e) Facsimiles where photocopy has been made.
- f) Telephone /Fax message

Compliance & Consequences:

If an Employee is found to be in breach of this Policy, disciplinary action would be initiated which may include dismissal from the employment, depending upon the facts and circumstances of each case. Disciplinary action may be taken regardless of whether the breach is committed during working hours, and whether PDS Group's electronic equipment or other property are used for the purpose of committing the breach. Appropriate legal actions may be initiated against persons, who have breached this Policy even after they cease to be an Employee of PDS Group.

Further, Employees should not speak to the media. All queries should be directed to your **Corporate Communications team** at corpcomm@pdsLtd.com.

Related Documents:

This Policy should be read in conjunction with the following documents:

- The Companies Act, 2013.
- The SEBI Listing Regulations.
- Any other statutory/sectoral law applicable to the Company.

Ownership and Review:

Ownership: This Policy shall be owned and administered by Board of Directors of the Company.

Review: The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(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(s), clarification(s), circular(s) etc.

Version History:

Version No.	Approved on	Created by	Approved by
1	November 13, 2015	Secretarial Team	Board of Directors
2.	May 27, 2021	Secretarial Team	Board of Directors
3.	January 28, 2025	Secretarial Team	Board of Directors
4.	October 27, 2025	Secretarial Team	Board of Directors

Annexure 1**Retention Schedule Documents Related to Secretarial and Board Related Matters**

Sl. No.	Record Type	Retention Period	Category
1	Certificate of incorporation, Memorandum/Articles of Association and any Licenses and Permissions	Permanent	A
2	Listing Agreement, Statutory Returns submitted with Stock Exchanges from time to time	Permanent	A
3	Common Seal, if required by law	Permanent	A
4	Minutes of the Board Meeting, various Committees Meetings and General Meetings and Scrutinizer's report	Permanent	A
5	Statutory Forms and disclosures except routine compliances	Permanent	A
6	Statutory Registers that may be applicable for listed Company	Permanent	A
7	Policies Formed by the Company under various laws and regulations	Permanent	A
8	Court Orders relating to shareholder matters	Permanent	A
9	Register of Members along with the Index	Permanent	A
10	RBI Licenses/ Certificates/ Renewals etc.	Permanent	A
11	Miscellaneous licenses/ Certificates obtained from Statutory Authorities including Labour Laws/ Taxation Laws, etc.	Permanent	A
12	Property Records--- Agreements/ Contracts / Documents relating to acquisition and sale of Real Property.	Permanent	A
13	Other records as may be required under any law(s), from time to time.	Permanent	A
14	Annual Returns and copies of all certificates and documents required to be annexed prepared under section 159, 160 and 161	8 Years	B
15	Audited Financial Statements / Auditors Reports & Engagement letters of auditors	Permanent	A
16	Books of account and supporting documents, vouchers, records, contracts, deeds, agreements, etc	10 Years	B
17	Attendance registers	8 years	B
18	All notices under Section 184 of the Companies Act, 2013 read with Rule 9 of the Companies (Meetings of Board and its powers) Rules, 2014	10 Years	B
19	Agenda papers. Notice of Board Meeting, Committee Meeting, General Meeting and other related papers	10 Years	B
20	The instrument creating a charge or modification	10 Years	B

Sl. No.	Record Type	Retention Period	Category
21	All books and documents relating to the issue of share certificates, including the blank forms of share certificates	10 Years	B
22	Register of debenture-holders including an index of the names	15 years	B
23	Resolution passed by circulation	8 Years	B
24	Forms filed with ROC	Permanent	A
25	Correspondence with shareholders	8 Years	B
26	Newspaper cuttings of notices of Board meetings and Financial results	8 Years	B
27	Investor meet presentation	8 Years	B
28	Registers of deposits	10 Years	B
29	Foreign register of debenture-holder	10 Years	B
30	Registers of deposits	10 Years	B
31	The instrument creating a charge or modification	10 Years	B
32	Register of inter corporate loans, investments	Permanent	A
33	Register of transfer/transmission of shares	Permanent	A
34	Digital database for unpublished price sensitive information	10 Years	B

Other Documents/Electronic Records

Sl. No.	Record Type	Retention Period	Category
1	Images of payment instruments (CTS)	10 Years	B
2	Tele transfer (including electronic fund transfer) confirmations	10 Years	B
3	Wiretransfer messages and confirmation messages	10 Years	B
4	Confirmations of E-mail, telegram, telephone, fax etc.	10 Years	B
5	Backups in floppies and CDs, Hard drives etc.	10 Years	B
6	EXE files-files to run the software	10 Years	B
7	Source codes creating EXEs	10 Years	B

Files (including those in Electronic Media)

Sl. No	Record Type	Retention Period	Category
1	Closed Loan Accounts-Personal files	10 Years	B
2	Correspondence with branches	10 Years	B
3	Concurrent Audit Reports where all comments are rectified and no comments relating to disciplinary proceedings pending	10 Years	B
4	RBI inspection Reports where all comments are rectified and no comments relating to disciplinary proceedings pending	10 Years	B
5	Detailed Internal Inspection Report file where all comments are rectified and no comments relating to disciplinary proceedings pending	10 Years	B
6	Personal files of customers	10 Years	B
7	Confidential files	10 Years	B
8	Files relating to claims of deceased customers	10 Years	B
9	General correspondence	10 Years	B
10	Stop payment Instruction file	10 Years	B
11	Loan Document files (other than those returned to borrower)	10 Years	B
12	Balance sheet of the Company/ Subsidiaries/ Consolidated financials etc.	10 Years	B
13	Charge Taking Reports	10 Years	B
14	Files on Unclaimed Accounts	10 Years	B
15	Files relating to Income Tax including Income Tax returns, Tax deducted at source, etc	10 Years (16 years in case of income in relation to any asset (including financial interest in any entity) located outside India)	B
16	Licenses, sanctions from REI/Government/local bodies and the like for activities which are concluded, and which are no more relevant	10 Years	B
17	Postal receipts and acknowledgment Receipt and acknowledgment of Swift etc.	10 Years	B
18	Insurance Policy Execution/Renewal Certificate	10 Years	B
19	Insurance Claims under various Policies	10 Years	B
20	Contracts/ Agreements/ Purchase Orders including Renewal, Modification and Termination	10 Years	B

21	Loan Agreements with the Clients including Mortgages/ Title Deeds	10 Years (except Title deeds which shall be preserved until returned to client)	B
22	RBI Records including Statutory Returns submitted from time to time	10 Years	B
23	Legal Records including Correspondence with Courts/ other statutory bodies regarding any petition/ case/suit etc.	10 Years	B
24	Personnel Records including Official Personnel Files of Active Employees and Official Personnel Files of inactive Employees	10 Years	B
25	Investment records	8 Years	B

Registers

Sl. No.	Record Type	Retention Period	Category
1	Attendance Register	Permanent	A
2	Leave Register	Permanent	A
3	Remittance Register	10 Years	B
4	Bills Register	10 Years	B
5	Clearing Register	10 Years	B
6	Loan Liability Register	10 Years	B
7	DD/MT/IT advices/register	10 Years	B
8	Drawing Power Register	10 Years	B
9	Stocks and shares Register	10 Years	B
10	Balancing Register	10 Years	B
11	Safe Custody Register	10 Years	B
12	Safe and Furniture Register	10 Years	B
13	Account Receivable/payable Register	10 Years	B
14	Power of Attorney Register	10 Years	B
15	Stop Payment Instruction Register	10 Years	B
16	Equitable Mortgage Register/Visit Register	10 Years	B
17	Letter of Credit Register	10 Years	B
18	Register of Investments not held in the name of the Company	Permanent	A
19	Register of duplicate & renewed certificates	Permanent	A
20	Register of contracts in which director are interested	Permanent	A
21	Audio recording and video recording and transcript of earnings conference call	8 Years	B

Annexure 2

Format of Register of documents disposed off /destroyed

Sl. No	Particulars of document along with provision of law	Date & mode of destruction	Initials of the authorize d personnel

