



Tourism Finance Corporation of India Limited

Policy for Preservation of Documents

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1. Scope:

The 'Policy for Preservation of Documents' (as defined below) would ensure safe-keeping of the records and safeguard the documents from getting mishandled, while at the same time avoiding overflow of inventory of documents. The Policy has been formulated pursuant to provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, on preservation of the documents to aid the Company in handling the documents efficiently. It not only covers the various aspects relating to preservation of documents but also the safe disposal/destruction of the documents.

2. Definitions:

"Act" means The Companies Act, 2013.

"Applicable Law" means any existing or new enactments, circulars, Laws, Rules, Regulations issued by the Government of India/State Governments or laws enacted by any overseas country which has an impact on the Company's businesses as also rules, regulations or standards which are issued by any statutory bodies in India and governing the Company.

"Authorised Person" means Managing Director/Whole-time Director or any other person duly authorised by the Board.

"Internal Committee of Executives" means committee of Executives comprising of Head (Accounts & Taxation), Head (Secretarial), Head (Legal) not below the rank of Vice President or any other employees duly authorised by the Managing Director/Whole Time Director.

"Board" means the Board of the Directors of the Company.

"Company" means Tourism Finance Corporation of India Limited.

"Current Documents" means any Document that still has an ongoing relevance without limitation or reference to any ongoing litigation, proceedings, complaint, dispute, contract or the like matter.

"Documents" 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 paper or in Electronic Form and does not include multiple or identical copies.

"Electronic Records" means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

"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 thereto.

"Maintenance" means keeping documents, either physically or in Electronic Form.

"Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed. Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

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

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

3. Coverage:

This Policy is intended to guide the Company and its employees on maintenance of documents, its preservation and disposal.

4. 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 as per Applicable Law, for the period required under Applicable Law.

Where there is no such requirement as per Applicable Law, 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 Document takes a considered view about its relevance; provided that generally speaking, a Document may be preserved for a period of 5 years from the date on which the Document was originated.

An indicative list of the Documents and the time-frame of their preservation is provided in Annexure-I

5. Modes of preservation:

- i. The Documents may be preserved in
 - a) Physical form, and/or in
 - b) Electronic Form
- ii. The Departmental Heads of the Company are required to preserve the documents and observe the compliance to the requirements of Applicable Law.
- iii. The preservation of Documents should be such as to ensure that there is no tampering, alteration and destruction. Nothing shall be done which endangers the content, authenticity, utility or accessibility of the Documents.
- iv. The preserved Documents must be accessible at all reasonable times. Access may be controlled by Departmental Heads with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

6. Custody of Documents:

Subject to the Applicable Law, the custody of the Documents shall be with the Internal Committee of Executives comprising of Head (Accounts & Taxation), Head (Secretarial) and Head (Legal). Where any member of the committee tenders resignation or is transferred from one location of the Company to another, such member shall hand over all the relevant Documents, lock and key, access control or password, or Compact Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Managing Director/Whole Time Director may authorize such other competent from the department as it may deem fit as member of committee.

7. 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 (not less than 8 years), by the Authorised Committee in whose custody the documents are stored, after the prior approval of the Managing Director/Whole Time Director 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. Utmost care is to be taken that files/documents are neither prematurely destroyed nor kept for period longer than necessary.
- iv. 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.
- v. The entries in the register shall be authenticated by Company Secretary/member of Internal Committee and the list of documents destroyed shall be put up to the Board of Directors for information.

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

8. 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 Managing Director/Whole Time Director.

9. 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.

10. Interpretation:

In the event that the terms of this policy differ from any existing or newly enacted Laws, Rules, Regulations or Standards governing the Company, the relevant Law, Rule, Regulation or Standard will take precedence over this policy and procedures laid there

under until such time this policy is altered to conform to the relevant Law, Rule, Regulation or Standard.

11. Disclosure :

This policy shall be communicated to all the employees and other concerned persons of the company and may be disclosed on the company's website www.tfcilttd.com

12. Policy Review :

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modification and subject to necessary approval of the Board of Directors.

1. Companies Act, 2013 and SEBI Regulations

A Permanent Preservation

- Memorandum and Articles of Association.
- Certificate of Incorporation
- Minutes of Board and Committee Meetings
- Minutes of Shareholders' Meetings
- Resolutions passed by circulation
- Listing Agreement executed with the stock exchanges
- Trading Approval relating to listing of securities
- Offer Documents for Public Issue and Private Placement of securities filed with SEBI
- Forms filed with Registrar of Companies (ROC)
- Register and Index of Members
- Register of investments in securities not held in the name of the Company
- Register of renewed and duplicate certificates
- Register of contracts in which Directors are interested
- Register of Directors, Managing Director, Manager and Secretary
- Register of Directors' Shareholding
- Register of Inter-corporate loans and investments
- Register of transfer of shares
- Register of Transmission of shares
- Agenda of the Board and Committee Meetings
- Register of records and documents destroyed
- Such other registers / documents as may be required to be maintained permanently under the Act.

B Temporary Preservation

- Notices pertaining to disclosure of Interest by the Directors (8 years)
- Annual Returns (8 years)
- Disclosures under SEBI – Substantial acquisition of shares and Takeovers, Regulations (8 years)
- Disclosures under SEBI – Prohibition of Insider Trading Regulations (8 years)
- Disclosures under SEBI – Listing obligations and disclosure requirements, Regulations (8 years)
- Scrutinizer's Reports on voting at General Meetings/ Postal Ballot (8 years)
- Newspaper cuttings of notices of Board Meeting and Financial Results (8 years)
- Investors meet presentations (8 years)
- Such other registers/documents as may be required to be maintained under the Act for the periods stipulated there under.

2. Accounts and Income Tax

A Permanent Preservation

- Permanent Account Number (PAN)
- Goods & Service Tax Number (GSTN)
- Annual Audited and Financial Statements
- Such other documents as may be required to be maintained permanently

B Temporary Preservation*

- Books of Accounts, Ledgers & Vouchers (8 years)
- Investment Records (8 years)
- Engagement letters from Auditors (8 years)
- Income Tax Returns, GST Returns, TDS Returns (8 years)
- Documents, Challans, and other details/correspondence related to Income Tax, GST and TDS (8 years)
- Such other documents as may be required to be maintained for the periods stipulated there under.

*except where no proceedings have been initiated/pending.

3. RBI NBFC Regulations

A Permanent Preservation

- Certificate of Registration issued by RBI and all other registrations required under the regulations supplementing the business.
- Documents to be preserved under RBI Master Direction shall be as per KYC -AML policy of the Company
- Such other documents as may be required to be maintained permanently

B Temporary Preservation

- RBI records including statutory returns submitted from time to time (8 years)
- RBI inspection reports along with management comments (8 years)
- Such other registers/documents as may be required to be maintained for the periods stipulated there under.

4. Legal files/others files (including Electronic Media)

Temporary Preservation*

- Closed Loan Accounts (8 years)
- General correspondence files (8 years)
- Loan Document files (other than those returned to borrower) (8 years)
- Contracts/ Agreements/ Purchase Orders including Renewal, Modification and Termination (8 years)
- Loan Agreements with the Clients including Mortgages/ Title Deeds (except Title deeds which shall be preserved until returned to client) (8 years)
- Legal Records including Correspondence with Courts/ other statutory bodies regarding any petition/ case/suit etc. (8 years)
- Personnel Records including Official Personnel Files of Active Employees and Official Personnel Files of inactive Employees. (8 years)

*except where no proceedings have been initiated/pending.

Annexure-II

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

- Brochures;
- 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 (subject to Clause 7 and 8 of this Policy);
- Facsimiles where a photocopy has been made;
- Telephone/Fax message;
- Drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 7 and 8 of this Policy);
- Routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 7 and 8 of this Policy); and
- As per the SEBI Regulations, all the disclosures made by the Company to the stock exchanges shall be also hosted on the Company's web site for a minimum period of 5 years where after they can be destroyed with the approval of the Board or by the authorized person.
- Any other documents which is not required to be preserved under applicable laws as amended from time to time.

Annexure-III

The format of the register of Documents disposed / destroyed

Particulars of document alongwith provision of the applicable law	Date and mode of destruction	Initials of Company Secretary / Members of Authorised Committee