

DOCUMENT RETENTION POLICY

(Approved by the Board of Directors of the Company through Resolution passed by Circulation on February 21, 2023)

The purpose of this policy is to ensure that all necessary documents and records of the company are adequately protected, maintained and to ensure that those records that are no longer required or having no value are discarded at the proper time. This policy aims at systematic and efficient control regarding periodicity of maintenance of documents and is applicable to all departments and business functionaries of the company. Under this policy, each department has an obligation to maintain official records and keep them in proper order and condition. This obligation applies to maintenance, storage, and disposal of physical records, also the records in electronic form. Proper document retention practices and ensuring compliance will contribute to more efficient business processes.

All documents shall be stored in a record room or in a separate carton box categorized/indexed properly in chronological order. If stored in a corugated carton boxes, ensure the box should be kept in a suitable dry place having less humidity. More over it should be examined regularly to confirm that our records are safe. The electronic records must be stored in preferably in different geographical location and the room should have controlled humidity and temperature. The digital data should be stored in such a manner there it remains accessible to so as to be usable for subsequent reference. The digital storage media should be selected on the basis of longevity and durability and such digital storage should be properly labeled and indexed for future reference.IT department should entrust a competent person for storage and retrieval of data in case of any disaster also to ensure confidentiality and data privacy while dealing with such data.

The records should not be taken out without prior approvals from the competent authorities. It is also to be noted item taken out document is placed back in original place without delay. In case of any demand of record/documents from police /Govt authorities, ensure a written request and acknoldgenet obtained from them and is to be kept in record.

The retention period calculation will start by end of the calendar year for example a document executed in June 2015 having retention period of 05 years the period will get expire on December 2020. In case of loan documents, the retention period starts from the date of closure of loan with full repayment or settlement. The concerned department should ensure that the documents should not be destroyed before completion of retention period. The records shall be destroyed only on prior approval from the competent authority. The details of records destroyed whether it is in physical form or in electronic form the details like brief description of document, date and mode of disposal/destruction etc. Should be recorded and maintained for future reference. M At

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Corporate Office : 4th Floor, No: 1871A24 | TEL +91 484 4281 111 E-mail : admindvn@klmaxiva.com Regd Office : Door No. 8-13, Plot No. 39, First Floor, Ashoka Complex, Above Indian Bank, Mythripuram-Colony, Gayathri Nagar X Road, Vaishalinagar P.O., Hyderabad, Ranga Reddy, Telangana - 500079.



Schedule of Record retention.

SI. No	Description of Record	Mode of Storage	Retention Period
1	Annual Reports and financials	Digital/Physical	Permanent
2	Company resolutions and minutes.	Digital/Physical	Permanent
3	Memorandum of association and articles of company	Physical	Permanent
4	Certificate of Incorporation	Physical	Permanent
5	Company Policies, Manuals and strategic plans	Digital/Physical	Permanent
6	Register of Charges	Digital/Physical	Permanent
7	Fraud/Investigation/Theft and other confidential files	Physical	Permanent
8	Court Orders	Physical	Permanent
9	Tax returns	Physical	Permanent
10	Licenses	Physical	Permanent
11	Legal actions against clients	Physical	Permanent
12	Insurance policies and Claim records	Physical	Permanent
13	Property Deeds/Purchase Agreements	Physical	Permanent
14	General Ledger and Book of accounts	Digital	Permanent
15	Disciplinary action File	Physical	Permanent
16	Loan Application and KYC	Physically/Digital	10 Years

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(Formerly known as Needs Finvest Ltd) CIN: U65910TG1997PLC026983

17	Sanction Letter	Physical	10 Years
18	DPN, Loan Agreements	Physical	10 Years
19	Account Transaction Details	Digital	10 Years
20	Registers(Cash, Gold,Key movement)	Physical	10 Years
21	Registers(Stationary, Despatch)	Physical	10 Years
22	Audit reports	Physical	10 Years
23	MIS Reports	Physical	10 Years
24	Bank statement ,Reconciliation	Physical	08 Years
25	Vouchers (cash, transfer, clearing)	Physical	08 Years
26	GST returns/IT/Service Tax returns	Physical	08 Years
27	Investment records	Digital/Physical	08 Years from date of redemption
28	HR personal file	Physical	05 Years after employments ends
29	Pay rolls	Digital/Physical	03 Years

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Annexure 1

DESTRUCTION CERTIFICATE

We hereby declare that below mentioned documents/Software has been destroyed in our presence as these documentss/software retention period is over and is no way it is useful to us. We certfy that Prior approval taken from dated for destruction of below metioned documents.

SI. No	Index No/Label No	Description of Documents	Mode of Destruction	Remarks
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Authorised Official (Name and Signature)