



CLARITY FINANCIAL SERVICES LIMITED

PRESERVATION OF DOCUMENTS POLICY

PREAMBLE

This policy attempts to preserve and maintain documents of the organisations. During the course of business, the Company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organisations. In order to preserve such documents, the Company needs to implement a well-considered, well- documented plan to ensure that they remain in good condition over a period of time.

PURPOSE OF THE POLICY

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents.

This policy seeks to ensure that the Company's business is adequately documented that are then managed in accordance with best practice.

Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

SCOPE

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

Definitions:

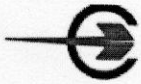
"Preservation" is maintenance of documents, files and data in usable form.

"Documents" means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

"Document Keeping" means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

"Company" means Clarity Financial Services Limited

"Board of Directors" or "Board" means the Board of Directors of Clarity Financial Services Limited, as



constituted from time to time.

“**Policy**” means policy on Preservation of Documents.

“**Storage Options**” means:

“**Online storage**” Documents are kept on a server or hard drive and are immediately available for use over a network. This option is best for documents that must be accessed frequently.

“**Offline storage**” Documents are stored on removable media and must be manually retrieved. This option provides the slowest access and should be used for documents that are only rarely needed.

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

POLICY:

a) LEGISLATIVE FRAMEWORK AND STANDARDS

- i) Companies Act, 2013.
- ii) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

b) CREATION OF DOCUMENTS

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should:

- i) facilitate necessary action by employees and their successors at any level at all points of time;
- ii) facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- iii) protect the financial, legal and other rights of the organisation, its clients and any other people affected by its actions and decisions.

c) MAINTAINENCE OF DOCUMENTS

Every member of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

- Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitized in business processes.
- Physical documents to be maintained in books and files.
- All digital and physical records are to be saved at the registered office and/or Corporate Office and/or at any other place as prescribed under Companies Act, 2013 and Listing Regulations and/or at the directions of the Board of Directors after complying with requisite formalities under the said Companies Act, 2013 or Listing Regulation.



d) DISPOSAL AND DESTRUCTION OF DOCUMENTS

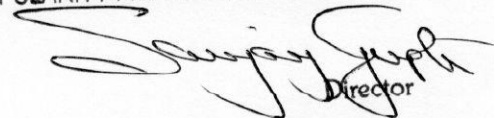
- All documents as mentioned in the Category A of this policy are temporary in nature and must be preserved for a period not more than 8 years from the end of the financial year or occurrence of the events or such other period as maybe prescribed under Companies Act, 2013 and Listing Regulations and amendments thereof and thereafter the records can be destroyed. However, all documents as mentioned in the Category B of this policy needs to be permanently preserved by the Company during its entire life time. Utmost care is to be taken to ensure that the said files/records/documents are well preserved.
- The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Department Head for the purpose. Inspection of this register is restricted.

Annexure

Category A		Category B	
S.I.	Registers:	S.I.	Registers:
1.	Register of Members of the company	1.	Register of Debenture Holders
2.	Register of Foreign Members	2.	Register of Foreign Debenture Holders
3.	Register of Loans, Guarantee, Security and Investments	3.	Register of Other Security Holders
4.	Register Charges	4.	Register of Deposits
5.	Register contracts or arrangements in which directors are interested and related party transactions	5.	Register of Sweat Equity Shares
6.	Register Company's Investments held in its own name by the Company	6.	Register of Employee Stock Option
7.	Register Renewed & Duplicate Share Certificates	7.	Register of Buy Back of Shares
8.	Register of Directors and KMP(s) and their Shareholdings	8.	Register of private placement offers
II	Records:	II	Records:
1.	Minute Books containing Minutes of Meeting of Board of Directors and all the Committees of the Board	1.	Books of Accounts including vouchers relevant to any entry in such books of account
2.	Minutes Books containing Minutes of proceedings of General Meeting of all the class of shareholders and creditors and of a resolution passed by way postal ballot	2.	Annual Return along with all Certificates and Documents annexed thereto
3.	All books and documents relating to the issue of share certificates, including the blank forms of share certificates	3.	Cancelled Share certificates
4.	All record relating to beneficial owner	4.	Disclosure of Directors in Form MBP-1.
		5.	Instrument creating or modifying the charge
		6.	Debenture Trust Deed
		7.	Register of Attendance for Meeting of Board of Directors and Committee thereof
		8.	Register of Members
		9.	Register of Proxies

Place: Kolkata
Date: 30.05.2019

For CLARITY FINANCIAL SERVICES LTD.


Director