

POLICY ON PRESERVATION OF
DOCUMENTS

Preface and objective

Trust Fintech Limited (the “Company”) is committed to being open and transparent with all stakeholders and believes in disseminating information in a fair and timely manner. The Board of Directors of the Company in pursuance of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) and other applicable provisions (including any statutory enactments/amendments thereof), adopted the following policy for preservation of documents (“Policy”) classifying them in at least two categories i.e.

- (a) documents whose preservation shall be permanent in nature; and
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions.

The listed entity may keep such documents in electronic mode.

Further Regulation 30 (8) of the SEBI Listing Regulations refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

In accordance with the above Regulation 9, Regulation 30 (8) and the provisions of the Companies Act, 2013, and other applicable provisions of law the Company has framed the Policy is framed in line with the existing provisions of the SEBI Listing Regulations and the Companies Act, 2013. Any future changes in the SEBI Listing Regulations will, ipso facto, apply to this Policy.

Definitions

“Archival” means accumulation/storage of historical records on server/network or at a physical place.

“Board of Directors” or “the Board” means the Board of Directors of Trust Fintech Limited, as constituted from time to time.

“Documents” or “Records” mean a piece of written, printed, or electronic matter that provides information or evidence or that serves as an official record of the Company.

“Preservation” or “preserve” means maintenance of documents and records (whether physical or electronic) in usable form and in good order, to prevent from being damaged or destroyed or tampered with.

“Listing Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, together with the circulars issued there under, including any statutory modifications or re- enactments thereof for the time being in force.

Effective date

The Policy shall come into force with effect from the date Regulation 9 of the SEBI Listing Regulations takes effect with respect to the Company.

Documents to be preserved

This Policy sets the standards for preservation of documents of the Company, broadly classified in the following categories, which may be preserved, in physical and/or electronic mode.

- (i) Category A – Documents whose preservation shall be permanent in nature

Annexure 1 of this Policy contains the details of documents whose preservation shall be permanent in nature. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- (ii) Category B – Documents to be preserved for not less than eight years after completion of the relevant transaction.

Annexure 2 of this Policy contains the details of documents with preservation period of not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

- (iii) Category C – General

In addition to the documents mentioned in sub-clause (i) and (ii) above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing rules/ procedures/ practices of the Company or as per the applicable statutory/ regulatory provisions in this regard.

Annexure 3 attached herewith contains the details of documents with preservation period other than those mentioned in sub-clause (i) and (ii) above.

- (iv) Category D - Documents to be made available on the website of the company as required by the

Companies Act, 2013 and the SEBI Listing Regulations

- a) The Company shall maintain a functional website containing:

- The basic information about the Company,
- All information and/or documents as specified in the applicable provisions of Companies Act, 2013,
- All information and/or documents as specified in Regulation 46 (2) of the SEBI Listing Regulations,
- All information and/or documents mentioned in Part (B) of Annexure 2 of this Policy, which are required to be made available on the website of the Company, and
- All information and/or documents as mentioned in Regulation 30 of the SEBI Listing Regulations on material events.

- b) The Company shall ensure that contents of the website are correct.

- c) The Company shall update any change in the content of its website within two working days from the date of such change in content.

- d) Information and/ or documents required to be made available under Regulation 30 of the SEBI Listing Regulations shall be made available on the website simultaneously with disclosure to stock exchanges.

- e) The information and/or documents relating to all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of company for a minimum period of five years.
- f) Information and/ or documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz.
 - The information and/or documents shall be arranged financial year wise with further segregation into four quarters of the financial year.

All policies etc. or the information/ documents of a general nature shall be clubbed together at one place.

IV. Responsibility

The Company Secretary & Compliance office of the Company or any other person authorized by the Board shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them.

V. Mode of maintenance

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company.

All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under applicable law.

The preservation of the records 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 records. The preserved records must be accessible at all reasonable times. Access may be controlled by the heads of the respective business divisions/ departments with preservation, so as to ensure integrity of the records and prohibit unauthorised access.

VI. Destruction of documents

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors. This applies to both physical and electronic documents.

After the expiry of time mentioned in Clause 3 (iv) (e) of this Policy, the information and/or document shall be removed from the main website. The backup of such information and/or document which is removed from the main website shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years the backup may be permanently removed from the server.

VII. Dissemination of the Policy

The Policy, as amended from time to time, shall be placed on the website of the Company,

VIII. General

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

IX. Policy review

The board of directors of the Company (“Board”) may subject to applicable laws is entitled to amend, suspend or rescind this Policy at any time. Any difficulties or ambiguities in the Policy will be resolved by the Board of Directors in line with the broad intent of the Policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy.

In the event of any conflict between the provisions of this Policy and of the applicable law dealing with the related party transactions, such applicable law in force from time to time shall prevail over this Policy.

For Trust Fintech Limited

Sd/-

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